

# TSD File Inventory Index

Date July 14, 2004

Initial CM Kinetics

Facility Name		<u>Tony Barch Property</u>	
Facility Identification Number		<u>OH-D 982 218 489</u>	
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2 Notification and Acknowledgment	<u>Y</u>	C.1 Compliance - (Inspection Reports)	
3 Part A Application and Amendments	<u>Y</u>	C.2 Compliance/Enforcement	
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2 Closure/Post Closure Plans, Certificates, etc	<u>Y</u>	D.2 Corrective Action/Facility Investigation	
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TOTAL - 1

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Note: Transmittal Letter to Be Included with Reports

Comments

*Documents do not justify individual folders per schedule.*

**A.2 Part A/  
Interim Status**





UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
RCRA ACTIVITIES  
P.O. BOX A3587  
CHICAGO, ILLINOIS 60690

4/9/90

ATTN: James Boyd  
Moritz Inc  
400 Park Avenue East  
Mansfield, OH 44905

RE: EPA ID #: OH0982218489

In response to your request of 3/90 the following information  
has been updated:

- 1.) Name of Installation: Moritz Inc
- 2.) Contact Person: James Boyd
- 3.) Ownership: Frank Moritz
- 4.) Telephone: (419) 589-2435

If you have questions, please contact Sharon Kiddon at (312)886-6173.

Sincerely,

Arthur S. Kawatachi  
Information Section  
RCRA Program Management Branch

cc: State Agency  
File

Dy





## ID - For Official Use Only

C

T/A

C

W

1

**X. Description of Hazardous Wastes (continued from front)**

**A. Hazardous Wastes from Nonspecific Sources.** Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from nonspecific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
F003	F005	D001			
7	8	9	10	11	12

**B. Hazardous Wastes from Specific Sources.** Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

**C. Commercial Chemical Product Hazardous Wastes.** Enter the four-digit number 40 CFR Part 261.33 for each chemical substance your installation handles which may be hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

**D. Listed Infectious Wastes.** Enter the four-digit number 40 CFR Part 261.34 for each hazardous waste from hospitals, veterinary hospitals, or medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

**E. Characteristics of Nonlisted Hazardous Wastes.** Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24)

- ☒ 1. Ignitable (D001)
 ☐ 2. Corrosive (D002)
 ☐ 3. Reactive (D003)
 ☐ 4. Toxic (D000)

**XI. Certification**

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature

Name and Official Title (type or print)

Date Signed

Estimated burden: Public reporting burden for this collection of information is estimated to be 3 hours, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to Chief, Information Policy Branch, PM-223, U.S. Environmental Protection Agency, 401 M St., S.W., Washington, D.C. 20460; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, D.C. 20503.

United States Environmental Protection Agency  
Washington, DC 20460

BB.0550

Please refer to the *Instructions for Filing Notification* before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).

## Notification of Hazardous Waste

## For Official Use Only

Comments

C  
C

Installation's EPA ID Number

Approved

Date Received  
(yr. mo. day)C  
F

04D982218489

T/A C  
1

A

871102

## I. Name of Installation

TRAILER MASTER LTD CO

## II. Installation Mailing Address

Street or P.O. Box

C  
3

400 PARK AVE EAST REAR

City or Town

State

ZIP Code

C  
4

MANSFIELD

OH 44905

## III. Location of Installation

Street or Route Number

C  
5

400 PARK AVE EAST REAR

City or Town

State

ZIP Code

C  
6

MANSFIELD

OH 44905

## IV. Installation Contact

Name and Title (last, first, and job title)

Phone Number (area code and number)

C  
2

MILLER TERRY

A. SEC 419 522 2323

## V. Ownership

A. Name of Installation's Legal Owner

B. Type of Ownership (enter code)

C  
R

DON KARR PRESIDENT

P

## VI. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to instructions.)

## A. Hazardous Waste Activity

## B. Used Oil Fuel Activities

- ☒ 1a. Generator ☒ 1b. Less than 1,000 kg./mo.
- ☐ 2. Transporter
- ☐ 3. Treater/Storer/Disposer
- ☐ 4. Underground Injection
- ☐ 5. Market or Burn Hazardous Waste Fuel (enter 'X' and mark appropriate boxes below)
- ☐ a. Generator Marketing to Burner
- ☐ b. Other Marketer
- ☐ c. Burner

- ☐ 6. Off-Specification Used Oil Fuel (enter 'X' and mark appropriate boxes below)
- ☐ a. Generator Marketing to Burner
- ☐ b. Other Marketer
- ☐ c. Burner
- ☐ 7. Specification Used Oil Fuel Marketer (or On-site Burner) Who First Claims the Oil Meets the Specification

## VII. Waste Fuel Burning: Type of Combustion Device (enter 'X' in all appropriate boxes to indicate type of combustion device(s) in which hazardous waste fuel or off-specification used oil fuel is burned. See instructions for definitions of combustion devices.)

☐ A. Utility Boiler☐ B. Industrial Boiler☐ C. Industrial Furnace

## VIII. Mode of Transportation (transporters only — enter 'X' in the appropriate box(es))

- ☐ A. Air ☐ B. Rail ☐ C. Highway ☐ D. Water ☐ E. Other (specify)

## First or Subsequent Notification

Mark 'X' in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA ID Number in the space provided below.

- ☒ A. First Notification ☐ B. Subsequent Notification (complete item C)

C. Installation's EPA ID Number

ID — For Official Use Only																
C															T/A	C
W																1

# X. Description of Hazardous Wastes (continued from front)

**A. Hazardous Wastes from Nonspecific Sources.** Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from nonspecific sources your installation handles. Use additional sheets if necessary.

1 F003	2 F005	3	4	5	6
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☒ 1. Ignitable  
(D001)

☐ 2. Corrosive  
(D002)

☐ 3. Reactive  
(D003)

☐ 4. Toxic  
(D000)

## XI. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature

Terry L. Miller

Name and Official Title (type or print)

TERRY L. MILLER  
ASST SECRETARY

Date Signed

10/28/87







State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.  
Columbus, Ohio 43266-0149  
(614) 644-3020  
FAX (614) 644-2329

TRACKING - DHWM, CM&ES

TO GO ON: ☒ RCRIS ☐ FO LOG ☐ USEPA LOG ☐ CJ LOG ☐ FILE  
ENTERED: 7/1 RCRIS ☐ FO LOG ☐ USEPA LOG ☐ CJ LOG ☐ ONLY  
RCRIS ENTRY CODES: (EVALUATION) \_\_\_\_\_ (ENFORCEMENT) 015  
CEI ☐ CI ☐ OTHER CME INITIAL NOV ☐ FOLLOW-UP NOV ☐  
FULL RTC ☐ PARTIAL RTC ☐ LDR ☐ SENT TO USEPA: YES ☐ NO ☐

George V. Voinovich  
Governor

Donald R. Schregardus  
Director

November 1, 1993

Re: Moritz, Inc.

OHD982218489

Richland County

Denver Roof  
Moritz, Inc.  
400 Park Avenue East  
Mansfield, Ohio 44905

Frank Moritz  
980 Moritz Lane  
Mansfield, Ohio 44905

Dear Mr. Roof and Mr. Moritz:

Enclosed is the final report for the Comprehensive Ground Water Monitoring Evaluation ("CME") that was conducted on July 28, 1993 at your facility located on the eastern edge of Mansfield, Section 22, Mansfield Township, Richland County, Ohio at 400 Park Avenue East.

The CME is to determine whether Moritz, Inc. has, in-place, a ground water monitoring system that is adequately designed, operated and maintained to detect releases or to define the rate and extent of contaminant migration from a regulated unit as required by Rules 3745-65-90 through 3745-65-94 and 3745-65-75(F) of the Ohio Administrative Code (OAC). The above noted regulations pertain to ground water monitoring. The site inspection was conducted by Rich Cisler, author, Division of Drinking and Ground Waters, Northwest District Office, Ohio EPA; Lisa Koenig, Division of Drinking and Ground Waters, Ohio EPA; and Eric Getz, Division of Hazardous Waste Management, Northeast District Office, Ohio EPA. You represented Moritz, Inc. during the inspection.

The CME report consists of several sections including background information and data on the facility's history and operation, a discussion of the hydrogeology, a description of the ground water monitoring activities at the facility and various checklists and comments developed from these checklists.

A review of the CME revealed violations and deficiencies that are occurring or have occurred at the facility. These violations and deficiencies are explained in the Reporting Requirements section on page 11 and Compliance Status Summary section on pages 17 through 19 of the enclosed report.



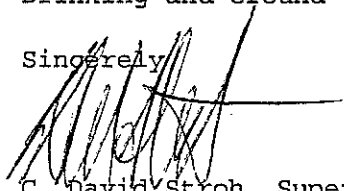
Printed on recycled paper

Denver Roof/Frank Moritz  
Moritz, Inc.  
November 1, 1993  
Page Two

Please submit written documentation demonstrating what actions you have taken or intend to take to abate these violations and deficiencies within thirty (30) days of receipt of this letter to both me and Janet Miller at the Northwest District Office.


If you have any questions, please contact me at (614) 644-2949. Questions of a technical nature should be directed to Rick Cisler of the Division of Drinking and Ground Waters at (419) 352-8461.

Sincerely,



C. David Stroh, Supervisor  
Compliance Monitoring & Enforcement Section  
Division of Hazardous Waste Management

Reviewed by:



Pamela S. Allen, Manager  
Compliance Monitoring & Enforcement Section  
Division of Hazardous Waste Management

Sp.DS.PA.nm.lcn

Attachment

cc: Tom Allen, DDAGW (without attachment)  
Janet Miller, RCRA Unit Supervisor, NWDO (without attachment)  
Laurie Stevenson, CM&ES, DHWM, CO (without attachment)  
Rich Cisler, DDAGW, NWDO (without attachment)

## VI. DETECTION MONITORING PROGRAM

### Detection Monitoring Program Description

The owner previously submitted a monitoring program plan which complies with OAC 3745-65-93(B). However, as of July 22, 1993, the program has not been implemented.

### Detection Monitoring Sampling Events

No ground water sampling/analysis has taken place, therefore, sampling events cannot be evaluated.

### Ground Water Quality Assessment Plan (GWOAP) Outline

The plan outline is included in a document of January, 1992, titled "Moritz, Inc., Revised Ground Water Monitoring, Sampling and Analysis Plan". This section is clearly titled. The GWQAP outline indicates the rate of migration will be calculated, but does not say how. The subject of in-situ hydraulic testing is not addressed. Moritz does not specify what statistical methods will be used to evaluate data from assessment monitoring. Moritz's GWQAP does not propose a framework for a schedule of implementation.

### Ground Water Quality Analytical Results

The owner has not reported any ground water analytical results during the current compliance period.

## VII. RECORDKEEPING AND REPORTING REQUIREMENTS

### Recordkeeping Requirements

At the time of the inspection, the owner did not have any records or analytical results on site, as required by OAC 3745-65-94.

### Reporting Requirements

During the compliance period, the owner did not report any sample analysis results or statistical evaluations to the Director of the Ohio EPA as required by OAC 3745-65-93(B) through (F) and 3745-65-94. Moritz has not submitted annual reports by March 1, 1992 and March 1, 1993, as required by OAC 3745-65-94.

### VIII. COMPLIANCE STATUS SUMMARY

As a result of this Comprehensive Ground Water Monitoring Evaluation, the following violations and deficiencies of rules 3745-65-90 through 3745-65-75(F) of the Ohio Administrative Code have been identified concerning the ground water monitoring program conducted by Moritz Incorporated. Each violation or deficiency is cited below with explanation of the nature of occurrence provided. For additional information, the CME report text and the attached technical and regulatory checklists in Appendices A and A-1 should be consulted.

#### VIOLATIONS

##### 3745-65-90 (A) and (B)

The Moritz Inc., has failed to implement and operate a ground water monitoring system capable of determining the facility's impact on the uppermost aquifer underlying the facility as required by rule 3745-65-90 (A) and (B).

The facility has not designed a monitoring system with sufficient knowledge of the hydrogeologic conditions present beneath the site and within the immediate vicinity of the facilities hazardous waste unit.

##### 3745-65-91 (A) (1) (a)

Moritz Inc., has failed to demonstrate that the "upgradient" well is representative of background water quality in the uppermost aquifer near the facility as required by 3745-65-91 (A) (1) (a)

MW #1 is not upgradient from the land disposal unit most of the year, as indicated by flow direction maps submitted by Moritz. Also, the integrity of sample results from MW #1 is questionable because of the cracked concrete, loose seal, and loose collar.

##### 3745-65-91 (A) (2)

Moritz Inc., has failed to install a minimum of 3 downgradient wells that are capable of immediately detecting any statistically significant amounts of hazardous waste or hazardous waste constituents that may migrate from the waste unit to the uppermost aquifer as required by 3745-65-91 (A) (2) of the Ohio Administrative Code.

Downgradient wells #2, #3, and #4 are not sufficiently located downgradient of the facility to intercept the northern component of the ground water flow. No boring logs or hydrogeologic information has been submitted to determine if the well screens are at appropriate depths to enable representative ground water samples to be collected.

The monitoring wells may not be installed at depths capable of providing samples containing site-specific waste constituents (i.e. petroleum distillates, xylene, and toluene) that may be migrating from the waste management area. The Sampling and Analysis Plan indicates that the monitoring wells, which have five-foot screens, were installed "to a depth of five feet (5') below the uppermost ground water table." Since the water table likely was near its seasonal lowest point in June, when the wells were constructed, the water table may be above the reach of the well screens through out much of the year. If so, then the wells do not meet the requirements of 3745-65-91 (A) (2), which states that the "number, locations, and depths shall ensure that such wells immediately detect" any migrating waste constituents.

3745-65-91 (C)

Moritz Inc., has failed to demonstrate that the monitoring wells are installed in a manner that maintains the integrity of the monitoring well borehole as required by 3745-65-91 (C).

No well logs or detailed description have been submitted to determine the adequacy of the well construction and installation. The concrete pad around MW #1 was found to be badly damaged and the well collar was not secure. Also MW #1 is located below grade without appropriate seal to prevent surface water from entering into the annul vs space between the inner and outer well casing. Upon removal of the protective plate, the inner casing and cap were found to be covered with surface water.

OAC 3745-65-92 (A)

The Moritz Inc., has failed to keep a copy of the Sampling and Analysis Plan at the facility as required by rule 3745-65-92 (A)

OAC 3745-65-92 (A) through (E)

The Moritz Inc., has failed to determine the concentrations of parameters characterizing the suitability of ground water, parameters establishing ground water quality, and parameters used as indicator parameters as described by 3745-65-92 (B) (1), (2), and (3) of the Ohio Administrative Code. In addition Moritz Inc., has failed to establish background water quality as required by 3745-65-92 (C) of the Ohio Administrative Code and conduct semi-annual sampling events as required by 3745-65-92 (D). Elevation measurements must be obtained at each sampling event as required by 3745-65-92 (E) of the Ohio Administrative Code.

Moritz was designated as a land disposal unit subject to the ground water rules on May 7, 1987. Moritz closure plan was approved April 26, with the condition that a ground water monitoring plan be implemented. Ground water monitoring wells were installed in June of 91, therefore the company has had sufficient time to evaluate the system, establish background water quality and conduct semi-annual sampling events in accordance to the rules.

3745-65-93 (B) through (F) and 3745-65-94.

Moritz Inc. has not conducted any sampling events as required by OAC 3745-65-92, and is therefore in violation of rule 3745-65-93 (B) through (F) and 3745-65-94 of the Ohio Administrative code.

Moritz Inc. failed to evaluate/respond and keep records/report ground water quality and water elevation data as required by 3745-65-93 (B) through (F) and 3745-65-94 of the Ohio Administrative Code, respectively.

3745-65-75 (F)

Moritz Inc. has failed to submit an annual report by March 1 for 1992 and 1993 as required by 3745-65-75 (F) of the Ohio Administrative Code.

#### DEFICIENCIES

1. The following are observations noted during the CME site inspection regarding the maintenance of the monitoring wells at the facility:
  - a. No surveyors' mark was visible on any of the detection monitor wells.
  - b. No identifying information on Monitoring Well #4 or Monitoring Well #2.



State of Ohio Environmental Protection Agency

Northwest District Office

47 North Dunbridge Road  
P.O. Box 466  
Bowling Green, Ohio 43402-0466  
(419) 352-8461 FAX (419) 352-8468

RECEIVED  
OHIO EPA

AUG 6 1991

DIV. of SOLID & HAZ. WASTE MGT.

George V. Voinovich  
Governor

Re: Moritz, Inc.  
OHD982218489  
Hazardous Waste  
Richland County

August 5, 1991

Mr. Frank Moritz  
Moritz, Inc.  
400 Park Avenue East  
Mansfield, Ohio 44905

Dear Mr. Moritz:

Please find attached the Ohio EPA Division of Ground Water's comments and conclusions upon review of the Moritz Ground Water Monitoring Plan and Sampling and Analysis Plan.

If you have any questions concerning the Division of Ground Water's attached comments and conclusions, please contact either Tim Fishbaugh in the Northwest District Office at (419) 352-8461 or Barb Lubberger in the Central Office at (614) 644-2906. All reports/data, as stated in the attachment, should be submitted to Phil Williams, Division of Solid and Hazardous Waste Management, Northwest District Office, Ohio EPA.

Sincerely,

Janet Leite Miller  
RCRA Group Leader  
Division of Solid and  
Hazardous Waste Management

/dlh

Attachment

cc: Laurie Stevenson, DSHWM, CO  
Barb Lubberger, DGW, CO  
Tim Fishbaugh, DGW, NWDO  
NWDO File



**COMPREHENSIVE GROUND WATER MONITORING EVALUATION**

**OF**

**MORITZ, Inc.**

**RICHLAND COUNTY**

**MANSFIELD, OHIO**

**OHD 982218489**

**OHIO ENVIRONMENTAL PROTECTION AGENCY**

**SEPTEMBER 28, 1993**



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.  
Columbus, Ohio 43266-0149  
(614) 644-3020  
FAX (614) 644-2929

September 28, 1993

OHD 982 218 489

George V. Voinovich  
Governor

Donald R. Schregardus  
Director

Mr. Kevin Pierard, Chief  
Ohio-Minnesota Technical Enforcement Section  
Hazardous Waste Enforcement Branch, 5HS-12  
U.S. EPA, Region V  
77 West Jackson Boulevard  
Chicago, Illinois 60604

RECEIVED  
SEP 29 1993  
OFFICE OF RCRA  
WASTE MANAGEMENT DIV.  
EPA, REGION V

Dear Mr. Pierard:

Please find enclosed the final CME for Moritz, Inc. This document, submitted in partial fulfillment of the 1993 RCRA grant commitment for fourth quarter, is based on a site inspection conducted on July 28, 1993. This document was prepared by Rick Cisler of the Division of Drinking and Ground Waters, Northwest District Office of the Ohio EPA, with the assistance of Eric Getz of the Division of Hazardous Waste Management, Northwest District Office.

If you have any questions, please contact me at (614) 644-2905.

Sincerely,

Thomas Allen, Assistant Chief  
Division of Drinking and Ground Waters

TA/KC/jls  
COVER.CME

pc: Joel Morbito, Project Officer, U.S. EPA, Region V  
Linda Welch, Chief, DHWM  
John Sadzewicz, Chief, DDAGW  
Pam Allen, Manager, DHWM-CO (w/enclosure)  
Tom Crepeau, Manager, DHWM-CO (w/enclosure)  
Chuck Hull, Manager, DHWM-NWDO (w/enclosure)  
Tim Fishbaugh,, Supervisor, DDAGW-NWDO (w/enclosure)  
Laurie Stevenson, Supervisor, DHWM-CO  
Lisa Koenig, Hydrogeologist, DDAGW-CO  
Rick Cisler, Hydrogeologist, DDAGW-NWDO  
Eric Getz, Environmental Specialist, DHWM-NWDO  
File

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## I. GENERAL INFORMATION

### Purpose

This report documents the results of a Comprehensive Ground Water Monitoring Evaluation (CME) conducted at Moritz, Inc. facility in Mansfield, Ohio. The objective of a CME is to determine whether the owner/operator has, in-place, a ground water monitoring program that is adequately designed, operated, maintained to detect releases or to define the rate and extent of contaminant migration from a regulated unit as required by rules 3745-65-90 through 3745-65-94 and 3745-65-75(F) of the Ohio Administrative Code (OAC). The period of compliance under evaluation for this CME is from December 21, 1988 to July 28, 1993.

### Information Sources

This report is based on an extensive record review and a site inspection conducted at the facility on July 28, 1993. The purpose of the inspection was to observe and determine the adequacy of the ground water sampling procedures, obtain ground water surface elevations, verify the number and locations of monitoring wells, perform a surficial monitoring well construction and integrity inspection and review written records pertaining to the ground water monitoring program. The site inspection was conducted by Rick Cisler, author, Division of Drinking and Ground Waters, Northwest District Office, Ohio EPA; Lisa Koenig, Division of Drinking and Ground Waters, Ohio EPA, Central Office; and Eric Getz, Division of Hazardous Waste Management, Ohio EPA, Northwest District Office. Representing Moritz, Inc. during the inspection was Denver Roof, current owner of the property.

In addition to information acquired during the site inspection and review of correspondence contained in Ohio EPA files, the following documents provided information upon which this CME report is based:

Goldthwait, et al, 1967 Glacial Map of Ohio

Ohio EPA, 1988, Comprehensive Groundwater Monitoring Evaluation of Moritz, Inc.

Redmond, Charles E., et.al., 1975, Soil Survey of Richland County, Ohio, USDA Soil Conservation Service, 132 p.

Schmidt, James J., 1979, Groundwater Resources of Richland County, map.

Totten, Stanley M., 1973, Glacial Geology of Richland County, Ohio Department of Natural Resources, Report of Investigations No.88, 55 p.

Ohio Department of Natural Resources well logs,  
Sections 21 and 22, Madison Township, Richland County,  
Ohio.

Division of Hazardous Waste Management files, Ohio  
Environmental Protection Agency, Northwest District  
Office.

### Inspection Checklist

Attached to this document are checklists from the RCRA  
Comprehensive Ground Water Monitoring Evaluation Document  
(Directive 9950.2) and the Interim Status Ground Water Monitoring  
Program Evaluation Document (SW-954). The checklists completed  
for this facility are:

Appendix A: Comprehensive Ground Water Monitoring Evaluation  
Worksheet

Appendix A-1: Facility Inspection Form for Compliance with  
Interim Status Standards covering Ground Water  
Monitoring.

## **II. FACILITY HISTORY AND OPERATIONS**

### Facility Name

Moritz, Incorporated

### U.S. EPA I.D. Number

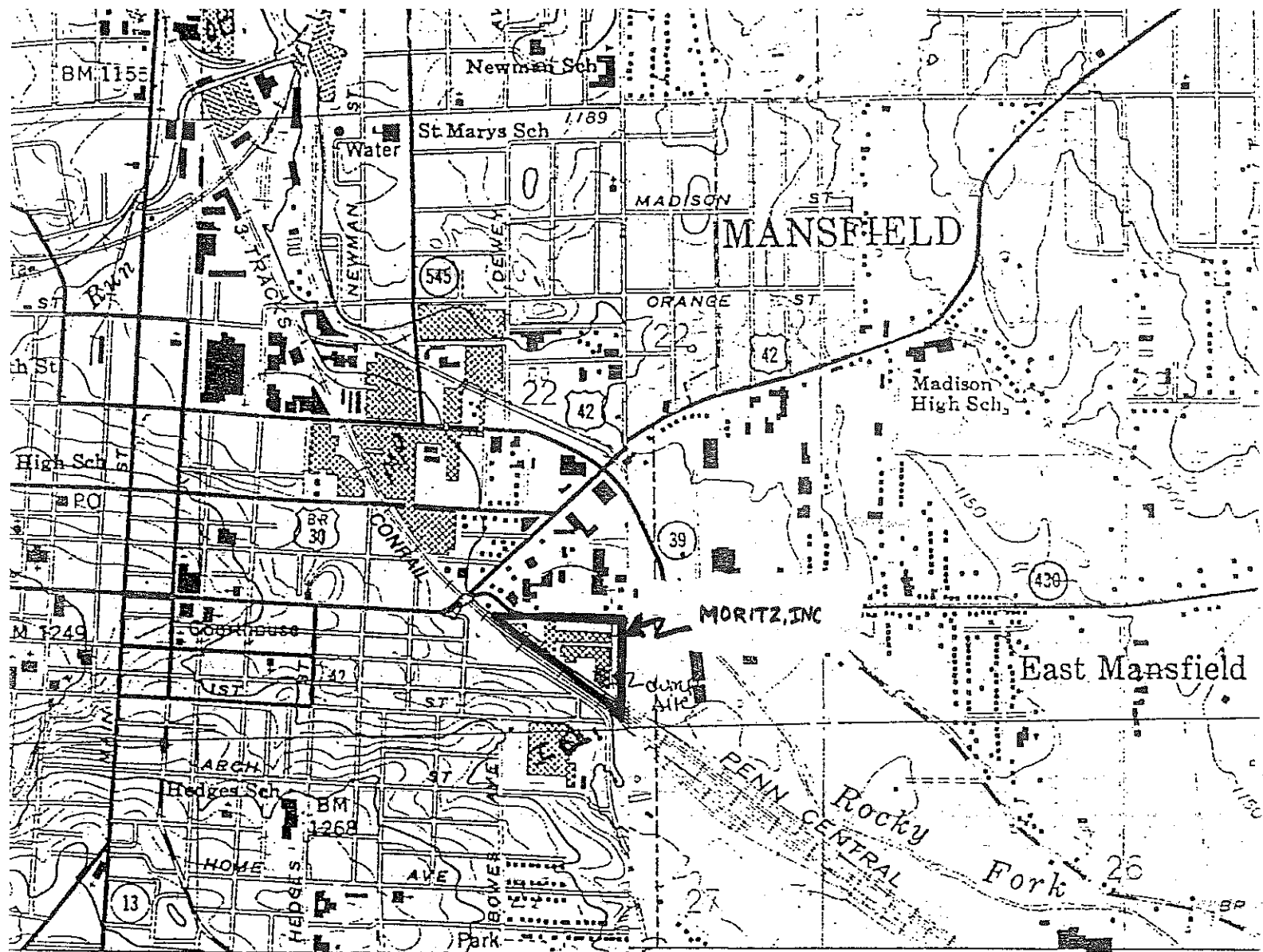
OHD982218489

### Facility Location

Moritz, Inc. is located on the eastern edge of Mansfield, Section  
22, Mansfield Township, Richland County, Ohio at 400 Park Avenue  
East. Richland County is located in central Ohio approximately  
65 miles northeast of Columbus and 79 miles southwest of  
Cleveland. The location of the facility is shown in Figure 1.  
Moritz, Inc. is in a mostly industrial area with other companies.

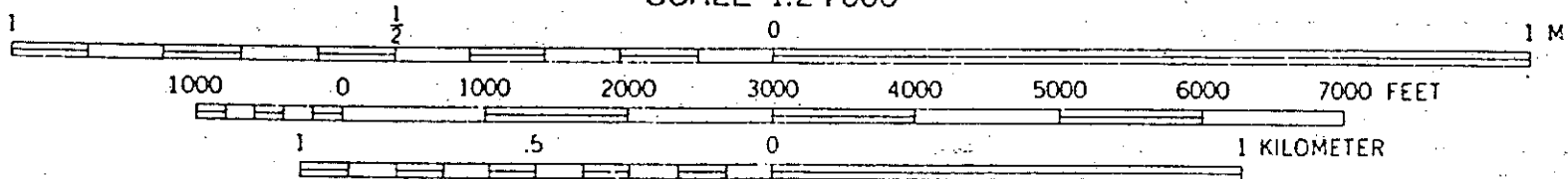
### Facility Description and Operation

Moritz, Inc. was a livestock trailer fabrication facility which  
employed approximately 66 people (1986). The company was  
established in 1964 and closed in 1992. After the trailers were  
constructed they were hand cleaned with solvent soaked rags  
before painting. The trailers were then painted and during this  
process solvents were used to thin the paints and clean the spray  
guns and other equipment. Three basic solvents were used which  
included xylene, toluene and aromatic petroleum distillates.



INTERIOR—GEOLOGICAL SURVEY, RESTON, VIRGINIA—1983  
 372 373000m.E. 82°30' 374 R.

SCALE 1:24 000



CONTOUR INTERVAL 10 FEET  
 DATUM IS MEAN SEA LEVEL

zone 17, shown in blue

Red tint indicates areas in which only landmark buildin

MANSFIELD NORTH, OHIO Entire area lies within Congress Lands north of the old

GENERAL FACILITY LOCATION

SOURCE: USGS 7.5" Topographic

Figure 1

Page 3

Moritz, Inc. stated, during an Interim Status Standards Inspection (October 27, 1988), that the cleaning and painting of trailers is done by another company subcontracted by Moritz, Inc. At the time of a Special Investigations Unit investigation (May 7, 1987), a company different from Moritz, Inc. did paint the trailers.

#### Hazardous Waste Materials Generated

The following wastes were handled at the facility:

1. F003 xylene
2. F005 toluene
3. D001 aromatic petroleum distillates

There may have also been heavy metal wastes generated from the paint. The solvent and ignitable wastes were generated from cleaning the trailers, spray guns and equipment. Some of these materials may have been reused in the paint.

#### Hazardous Waste Treatment, Storage, and Disposal Practices

It is alleged that the facility placed paint wastes, waste solvents and other unknown materials into and onto the ground and other unknown locations at the facility. Results of the soil sample analysis taken during a previous SIU investigation indicated contamination from lead, xylene, toluene, naphtha, and mineral spirits. The known disposal area has dimensions of approximately 100 by 125 feet (see Figure 2).

#### Regulatory History

In May 1987 the Ohio EPA's Special Investigations Unit (SIU) investigated charges of unauthorized disposal of paint wastes behind the facility. Analysis of soil samples indicated the presence of soil contamination by xylene, toluene, naphtha, mineral spirits and lead. During subsequent inspection by staff from DHWM-NWDO, the disposal area (approximately 100 by 125 feet) was classified a land disposal unit, subject to ground water monitoring regulations for interim status RCRA facilities, as embodied in OAC Rules 3745-65-90 through 94.

The Ohio EPA instructed Moritz to submit a closure plan for this land disposal unit. The facility submitted a closure plan for this area on May 16, 1989. On April 26, 1991, the Ohio EPA approved the facility's closure plan with seven (7) conditions; the first of which stated that a Ground Water Monitoring and Sampling and Analysis Plan was required to be prepared and submitted to the Ohio EPA.

Moritz submitted a Ground Water Sampling and Analysis Plan to the Ohio EPA on June 25, 1991, and revised plans on October 8, 1991 and January 13, 1992. The Ohio EPA provided comments to the facility concerning the submitted plans on August 5, 1991; October 31, 1991; and March 12, 1992.

On April 13, 1993, ownership of the facility was transferred from Frank Moritz to Tony Bandy of Wheelersburg, Ohio. On July 12, 1993, a meeting was held at the Attorney General's Office in Columbus with the pending owner of the facility, Denver Roof. Meeting attendees included Denver Roof; Leonard Cook, consultant; Phil Williams, Ohio EPA; Nyall McKenna, Ohio EPA; Lori Massey, Assistant Attorney General; and Eric Getz, Ohio EPA. This meeting was held to clarify the RCRA concerns and requirements for closure of the hazardous waste land disposal unit at the site.

### III. REGIONAL GEOLOGY AND HYDROGEOLOGY

#### Site Hydrogeology

On the basis of water levels submitted by Moritz, Inc., (see Table 1), it appears the ground water flow varies from due north to southeast depending on the season. Moritz's interpretation of ground water flow direction can be seen on Figures 4 and 5. At the time of the CME inspection Ohio EPA took water level measurements and determined flow to be to the northeast (see Figure 6). Moritz has not submitted any additional site specific hydrogeological information.

#### Regional Geology

The City of Mansfield, approximately 600 feet east-northeast of the site, is located on the Allegheny Plateau province and has a gently sloping topography towards Rocky Fork. Topographic elevations in the vicinity of the site range from approximately 1150 to 1160 amsl. Regional information indicates that the site is underlain by glacial deposits overlying sandstone and shale bedrock.

The site is located in an area classified as Urban Land. Urban Land describes areas covered mostly by buildings or pavement and where the original soil has been disturbed. Surrounding the Urban Land area is the Lobdell silt loam to the east, northwest and south. The Lobdell series consists of nearly level, moderately well-drained soils formed in alluvial sediments and is subject to occasional flooding. Lobdell silt loam is located on higher parts of flood plains in valleys, and is very variable in texture.

The shallow soils overlies glacial outwash deposits on the edge of the Rocky Fork Valley. The glacial outwash consists of valley trains and low terraces resulting from damming of the northward flowing Rocky Fork by glaciers. Meltwater then deposited sand and gravel, partially filling the preglacial valley. Postglacial erosion left terraces along the valley walls.

Sand and gravel is present in six out of twelve local ODNR well logs and was encountered 8 to 81 feet in depth.

Adjacent to the southwest side of the site is the Hayesville till which is a massive, compact, dark grey till containing nearly equal amounts of silt and clay with some pebbles. Weathered Hayesville till occurs at seven to ten feet in depth and often has horizontal partings.

The bedrock in the area of the site consists of the Black Hand Member of the Mississippian Cuyahoga Formation. The Black Hand Member is a resistant, coarse-grained, lens shaped sandstone which overlies the Pleasant Valley Member, also of the Cuyahoga Formation. To the east along the Rocky Fork stream valley, the uppermost formation is the Pleasant Valley Member, which consists of thin-bedded grey siltstones and shales.

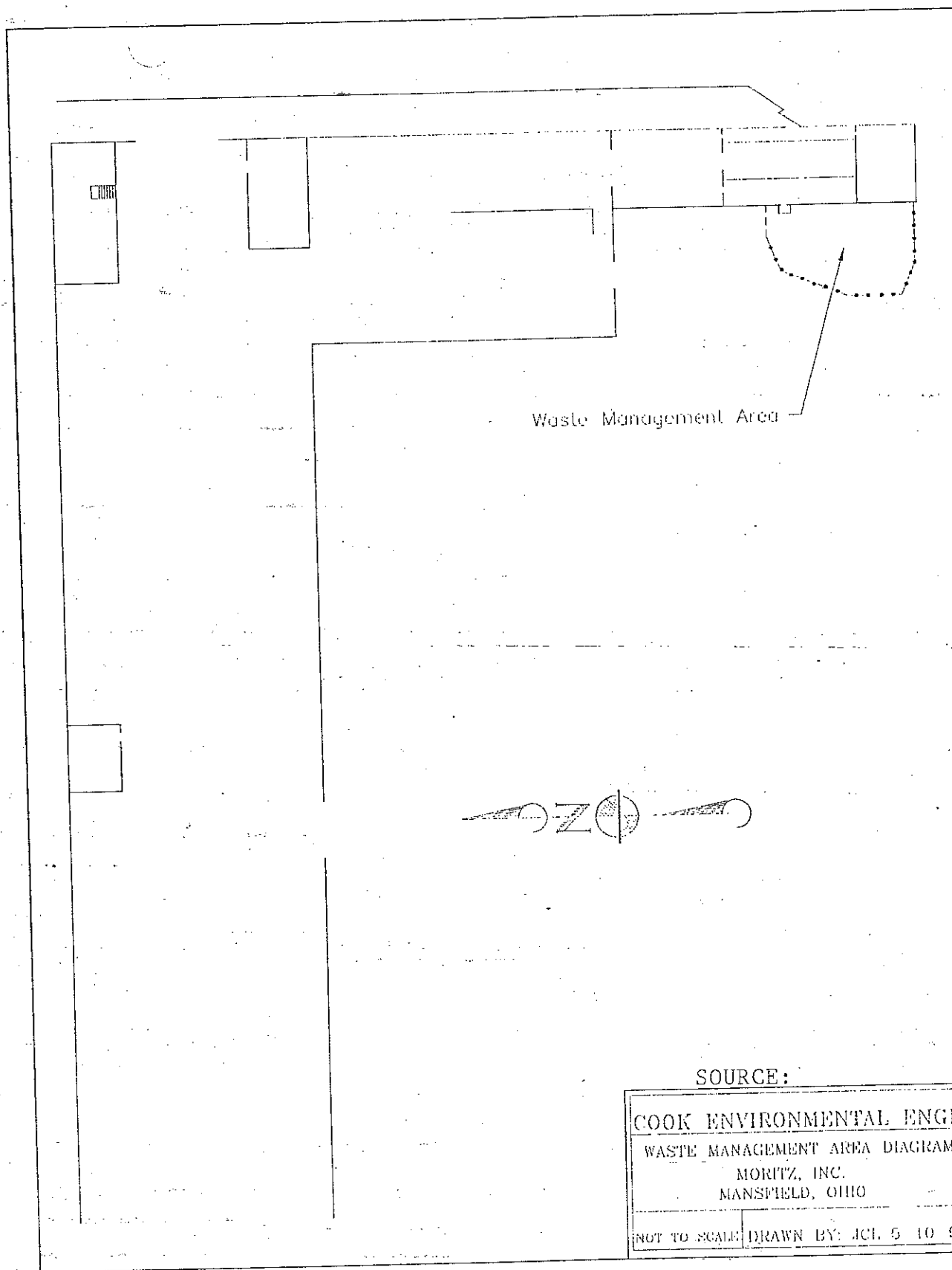
According to local ODNR well logs, depth to the top of the sandstone varies from 3 to 73 feet, and depth to the top of the shale varies from 98 to 107 feet.

Rocky Fork drains south to the Mohican River which drains to the Ohio River. Most of the surface drainage is probably controlled by city sewer systems and drainage sumps in parking lots and along roads.

Sand and gravel deposits within the buried valley underneath and surrounding Rocky Fork can yield more than 200 to 500 gpm at 120 to 275 feet depth. Sandstones and shales of the Cuyahoga Group can readily yield 5 to 20 gpm and more than 250 gpm at around 350 feet depth.

The City of Mansfield has public water supply wells in sand and gravel at 100 to 120 feet, located in Section 26, one to two miles to the southeast. Non-located ODNR well logs of Sections 21 and 22 show private wells installed both in sandstone and shale and overlying sands and gravels, where present. In all the well logs the depth to water varies from 30 to 87 feet.

The Rocky Fork is most likely hydraulically connected to the regional aquifer system, especially the sand and gravel. Because no adequate hydrogeologic work has been submitted to date, local direction of groundwater flow is questionable.



FACILITY SITE PLAN  
FIGURE 2  
PAGE 7

# MORITZ, INC. MONITORING WELLS ELEVATIONS

Reading #1 6/91***	Ground level*	Depth of water (from ground*)	Elevation of water*
well 1	1000.04	7.00	993.04
well 2	995.96	7.50	988.46
well 3	995.81	9.00	986.81
well 4	997.60	9.00	988.60
Reading #2 8/14/91**	Elevation of top of well*	Depth of water (top of PVC casing*)	Elevation of water*
Well 1	1000.54	6.29	994.25
Well 2	998.21	3.46	994.75
Well 3	998.56	3.75	994.81
Well 4	1000.68	5.17	995.51
Reading #3 9/14/91	Elevation of top of well*	Depth of water (top of PVC casing*)	Elevation of water*
Well 1	1000.54	6.65	993.89
Well 2	998.21	4.67	993.54
Well 3	998.56	4.65	993.91
Well 4	1000.68	5.58	995.10
Reading #4 9/19/91	Elevation of top of well*	Depth of water (top of PVC casing*)	Elevation of water*
Well 1	1000.54	6.85	993.69
Well 2	998.21	5.25	992.96
Well 3	998.56	5.10	993.46
Well 4	1000.68	5.65	995.03

\*ALL ELEVATIONS ARE IN FEET

\*\*THE LOCAL GROUND WATER GRADIENT AND THE (WELL) WATER DEPTHS HAD BEEN AFFECTED BY SEVERE LOCALIZED THUNDERSTORMS IN THE IMMEDIATE AREA OF THE MONITORING WELLS. THE GROUND SURFACE AROUND MONITORING WELLS #'s 2, 3, & 4 WAS INUNDATED WITH FREE STANDING WATER.

\*\*\*DEPTHS MEASURED BY DRILLERS DURING DRILLING.

TABLE 1  
GROUND WATER ELEVATION DATA SUMMARY (1991)  
SOURCE: Cook Environmental

#### IV. GROUND WATER MONITORING WELL SYSTEM

##### Ground Water Monitoring History

In June, 1991, Moritz, Inc. installed four (4) monitoring wells. At the time of drilling and on three subsequent events, the piezometric surface was measured. (See Figures 1 & 2 and Table 1). However, no detection monitoring was ever initiated. As of the July 22, 1993 CME Inspection, no ground water analytical results have been submitted to Ohio EPA.

##### Monitoring Well Placement

The entity has installed 4 detection monitor wells on the site (Figure 3). Upon inspection, it is apparent that the wells are properly located on the map furnished by Cook Environmental. While this hydrogeologic information furnished thus far is insufficient, it appears that all four detection monitoring wells monitor the uppermost aquifer to some degree.

Moritz has indicated that MW#1 is the "upgradient" monitor well. MW#1 is located in the southwest corner of the property (see Figure 3). Placement of MW#1, based on the ground water flow maps submitted by Moritz (see Figures 5 and 6) is not suitable for compliance with 3745-65-91(A)(1) and (C) because it is not capable of intercepting background contaminants entering the waste management area from offsite.

The entity reports installing three "downgradient" detection monitor wells, Monitoring Well #2, #3 and #4. All three wells are due east of the regulated unit. Monitoring Well #2 and Monitoring Well #3 are too far east of the hazardous waste area to be a useful part of the detection monitoring system (refer to Figures 4 through 6). Monitor Wells #2 and #3 are not capable of intercepting the northern component of flow from the regulated unit. The location of Monitoring Well #4 is also east of the regulated unit and located a short distance east from the south end corner.

According to the flow map submitted by Moritz, Inc., the detecting monitoring system does not comply with OAC 3745-65-91(A)(2). MW#2 and MW#3 are never downgradient during any of the flow regimes suggested by Moritz. Unless flow is in a southeast direction, MW#4 is not a downgradient well either.

### Monitor Well Installation and Construction

Moritz has not submitted sufficient well construction information or lithology logs for Ohio EPA to determine if wells are constructed in such a manner as specified in OAC 3745-65-91(C). However, Moritz does state that the wells are screened to a depth of 5 feet below the top of the uppermost aquifer. This well construction took place in June, when the water table would be expected to be at a seasonal low point. Therefore, the water table may be above the reach of the screen much of the year.

### Monitoring Well Maintenance

The CME inspection revealed several maintenance problems with monitor well #1 (see Table 2). MW#1 was flush mounted with a bolted cover. The seal was insufficient to keep out surface water as the well cap was under water. Also, the well collar was loose and the concrete pad was badly damaged. Monitor Wells #2-#4 did not appear to have any serious maintenance problems. MW#1 has not been maintained in such a way as to meet the minimum requirements of OAC 3745-65-91(C).

## **V. SAMPLING AND ANALYSIS PLAN AND PROCEDURES**

### Sampling and Analysis Plan Review

At the time of the CME inspection, a copy of the Sampling and Analysis Plan was not on site which is a violation of 3745-65-92(A) of the Ohio Administrative Code. A revised Sampling and Analysis Plan was received by Ohio EPA on January 27, 1992. This January, 1992 revision was done to correct deficiencies identified by Ohio EPA staff in an October, 1991 review. The revised plan will meet the requirements of OAC 3745-65-92(A) if followed correctly and implemented on a timely basis. As of the July 22, 1993 CME inspection, the plan has not been implemented.

### Field Evaluation of Sampling and Analysis Procedures

No field evaluation could be done because the owner elected not to perform sampling or have his consultants on site.

## **VI. DETECTION MONITORING PROGRAM**

### Detection Monitoring Program Description

The owner previously submitted a monitoring program plan which complies with OAC 3745-65-93(B). However, as of July 22, 1993, the program has not been implemented.

### Detection Monitoring Sampling Events

No ground water sampling/analysis has taken place, therefore, sampling events cannot be evaluated.

### Ground Water Quality Assessment Plan (GWQAP) Outline

The plan outline is included in a document of January, 1992, titled "Moritz, Inc., Revised Ground Water Monitoring, Sampling and Analysis Plan". This section is clearly titled. The GWQAP outline indicates the rate of migration will be calculated, but does not say how. The subject of in-situ hydraulic testing is not addressed. Moritz does not specify what statistical methods will be used to evaluate data from assessment monitoring. Moritz's GWQAP does not propose a framework for a schedule of implementation.

### Ground Water Quality Analytical Results

The owner has not reported any ground water analytical results during the current compliance period.

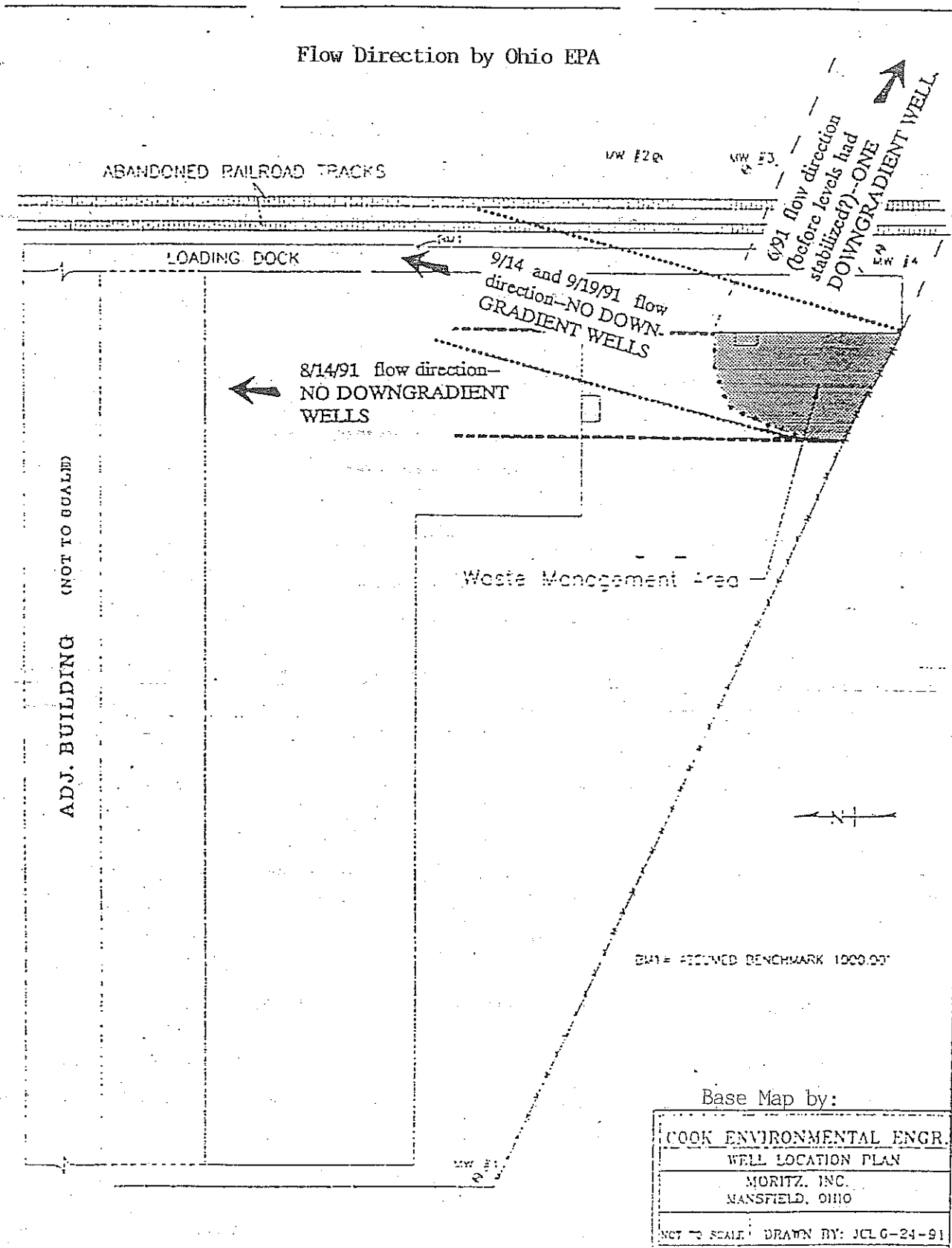
## **VII. RECORDKEEPING AND REPORTING REQUIREMENTS**

### Recordkeeping Requirements

At the time of the inspection, the owner did not have any records or analytical results on site, as required by OAC 3745-65-94.

### Reporting Requirements

During the compliance period, the owner did not report any sample analysis results or statistical evaluations to the Director of the Ohio EPA as required by OAC 3745-65-93(B) through (F) and 3745-65-94. Moritz has not submitted annual reports by March 1, 1992 and March 1, 1993, as required by OAC 3745-65-94.



GROUND WATER MONITOR WELL LOCATIONS

FIGURE 3

FIGURE 4  
GROUND WATER FLOW MAP - MORITZ, INC.  
JUNE, AUGUST 1991

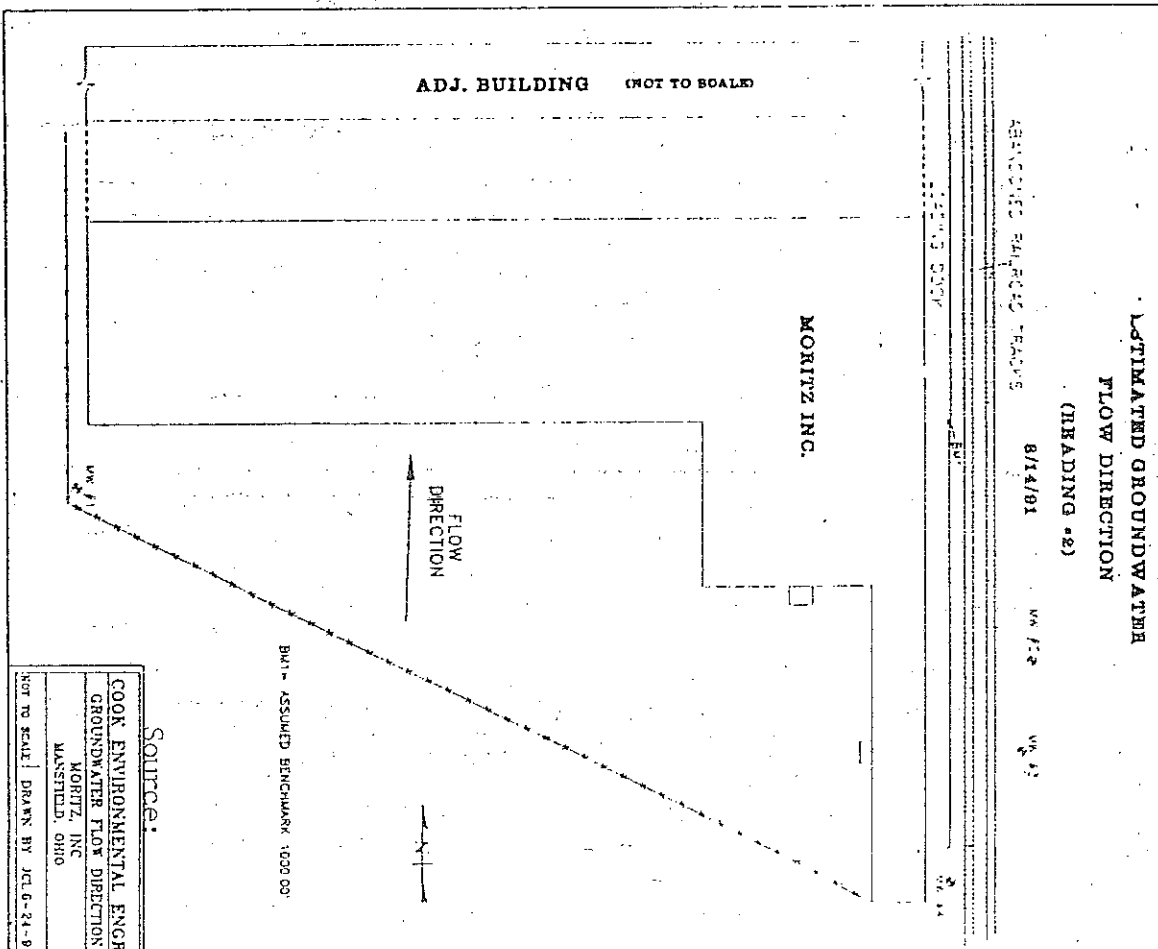
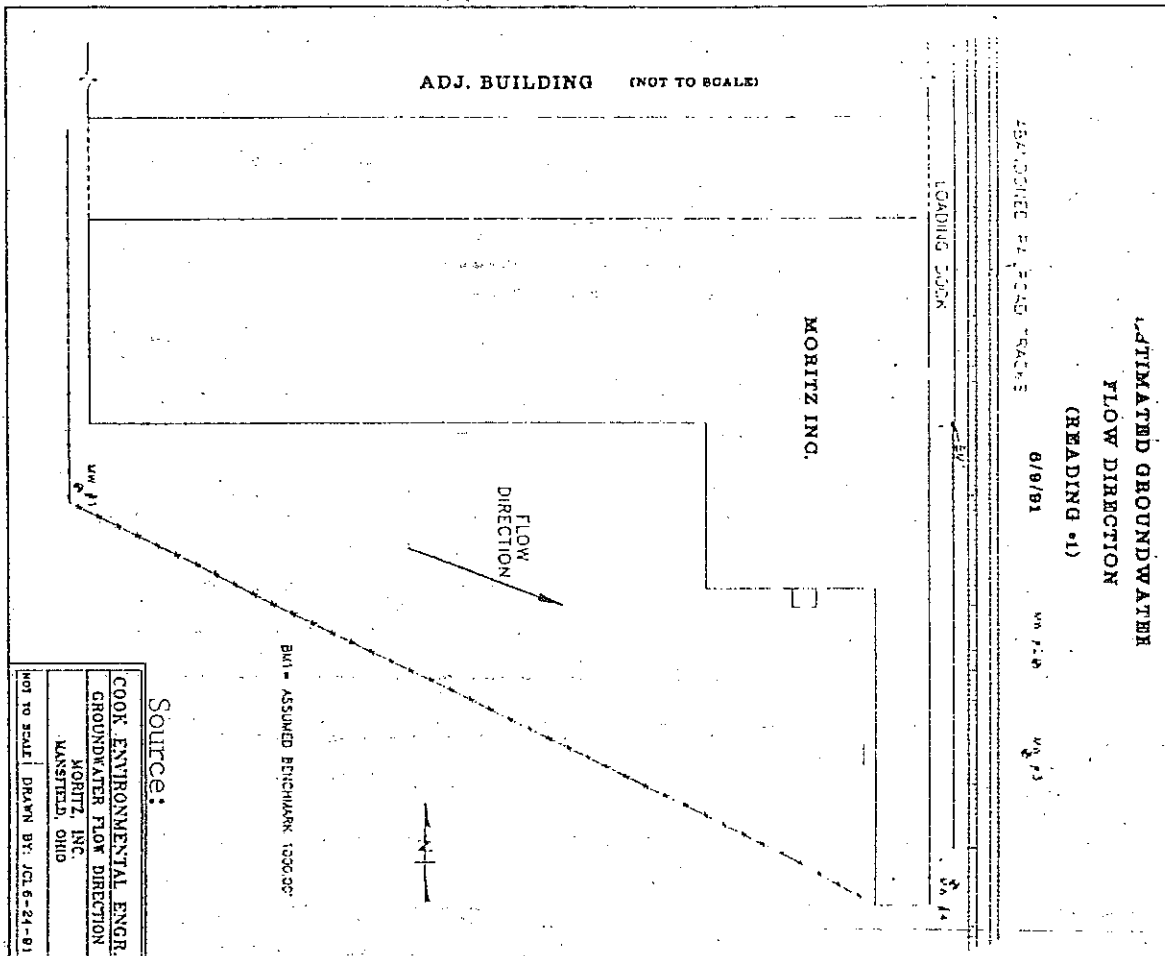
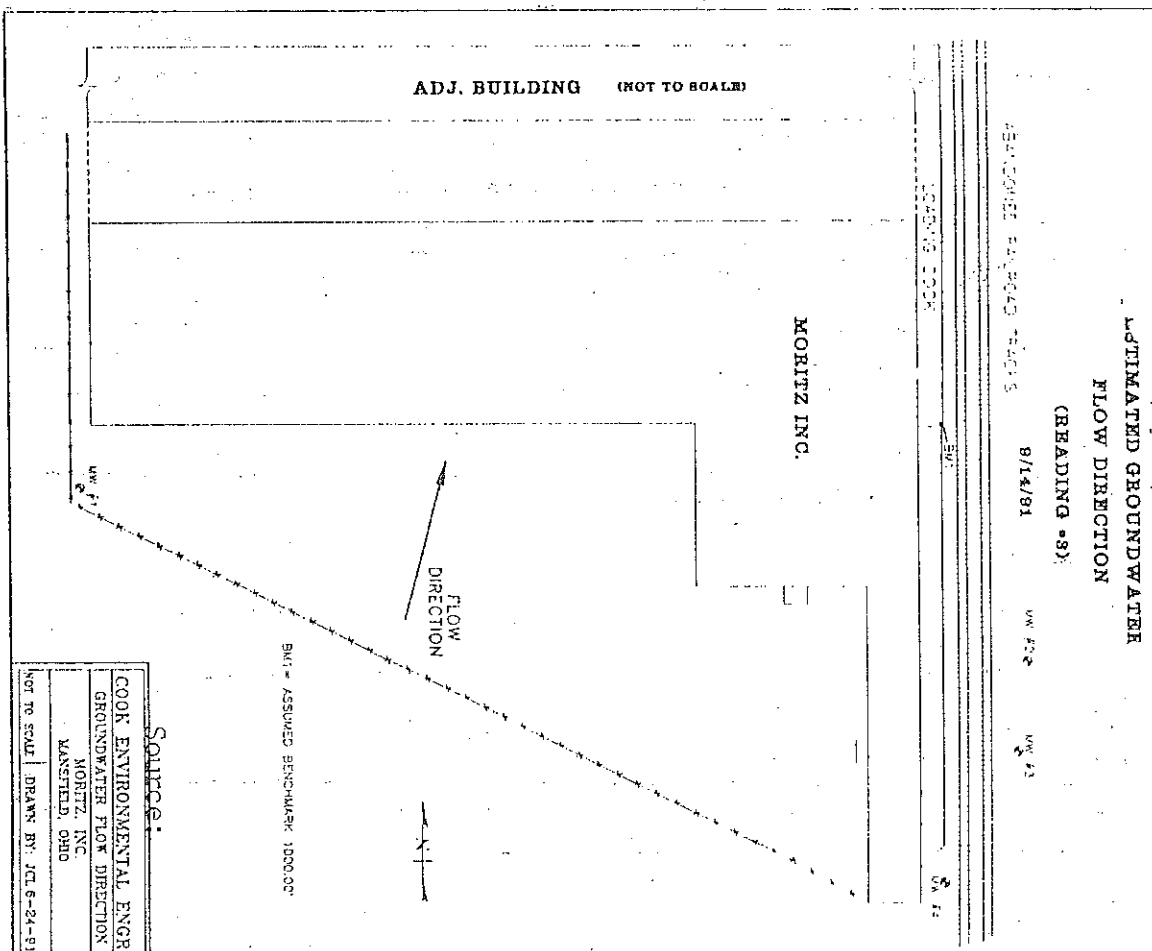
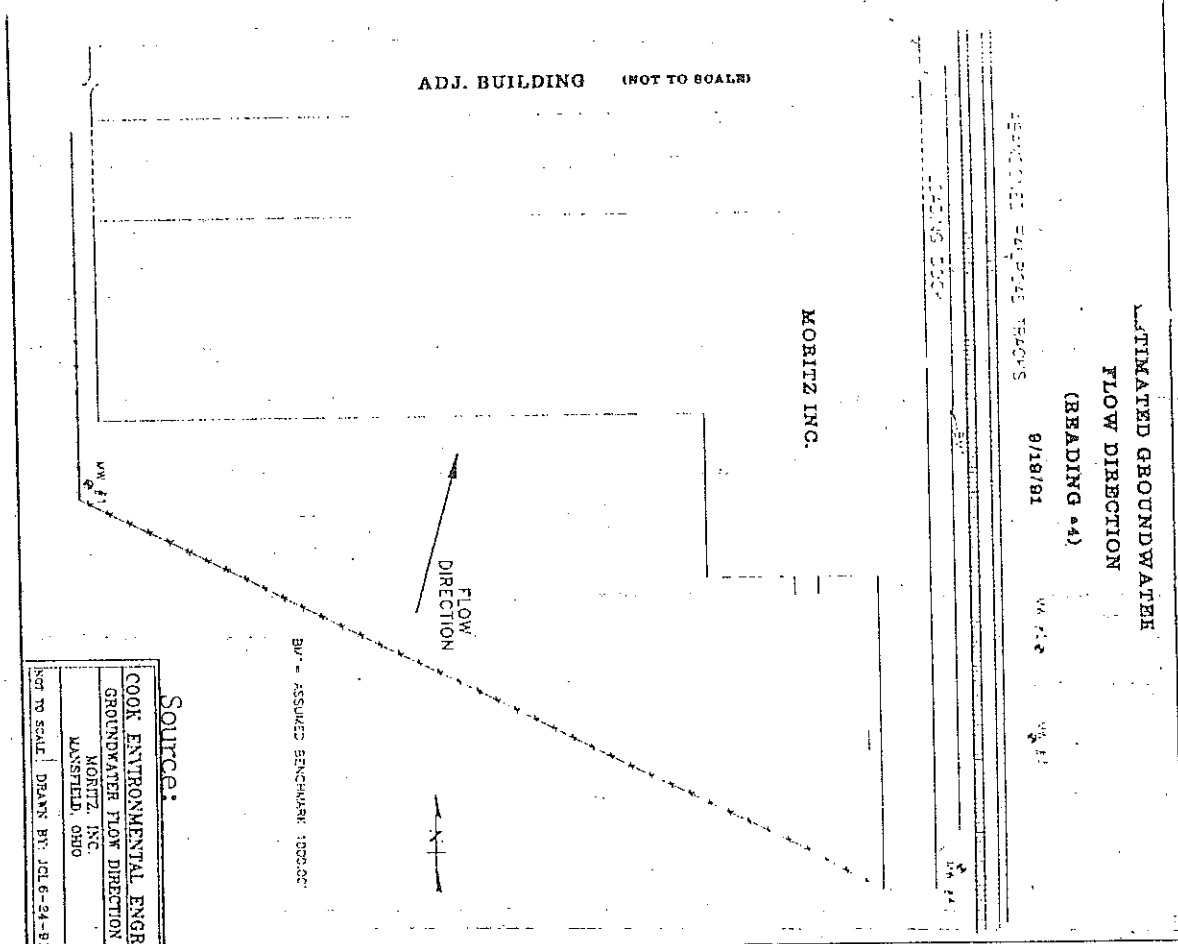


FIGURE 5  
GROUND WATER FLOW MAP - MORITZ, INC.  
SEPTEMBER, 1991



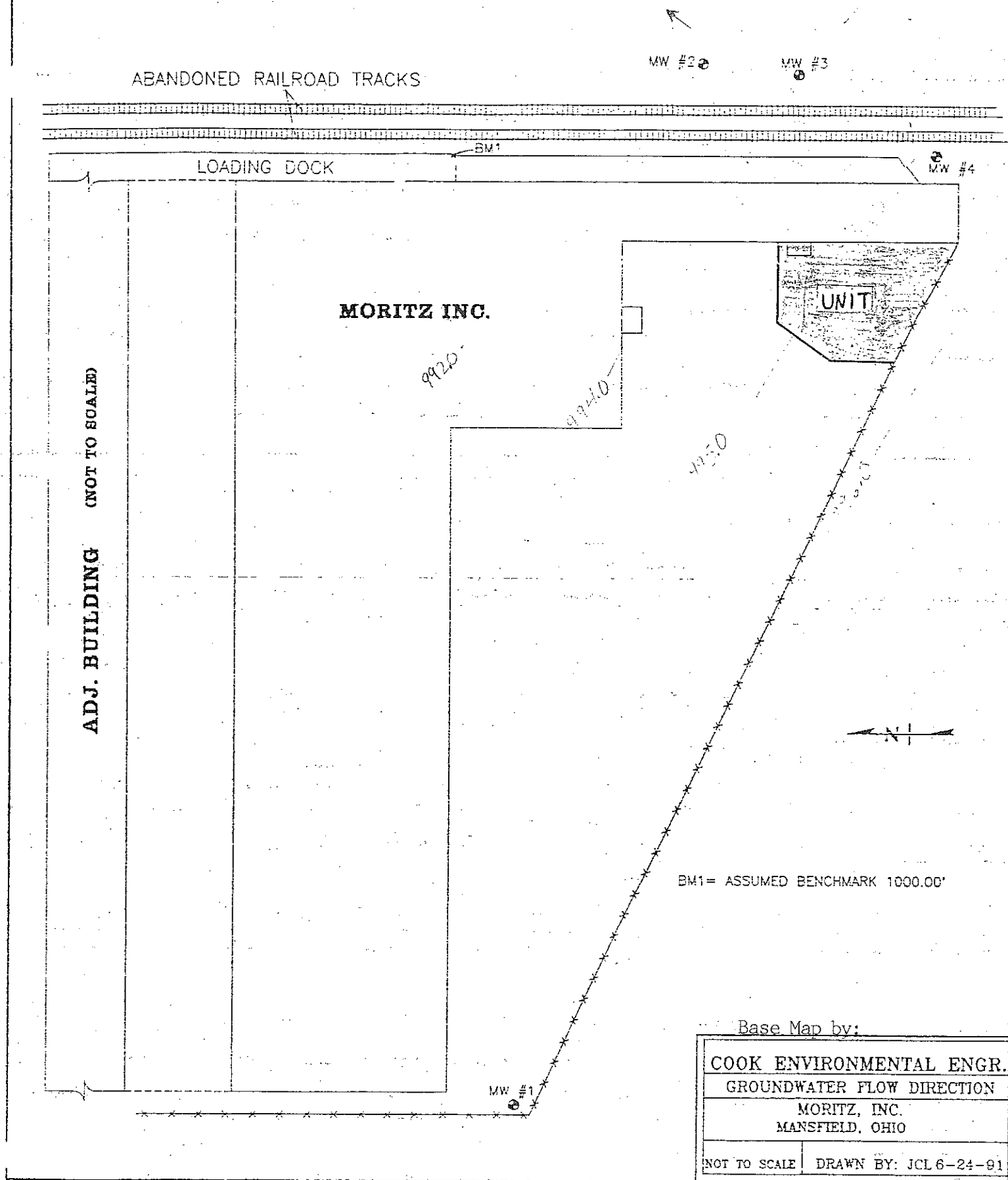


FIGURE 6  
POTENTIOMETRIC SURFACE BY OHIO EPA

TABLE 2

CHE GROUND WATER MONITORING  
FIELD INSPECTION FORM

DATE 7/22/93

FACILITY Moritz

MONITORING WELL I.D.	MW1	MW2	MW3	MW4	MW5	MW6	MW7	MW8	MW9	MW10	MW11	MW12	MW13	MW14	MW15	MW16	MW17	MW18	MW19	MW20
Correct location?	Yes																			
Labeled Properly?	No																			
Locking cap in good shape?	Bolted Cover																			
Locked? (innercasing)	Y																			
Outer Casing: Material	Steel																			
Condition	Rusted																			
Stickup	None																			
Condition of concrete pad	Cracked, flat																			
Ponding of water around well?	Yes																			
Inner casing: Material	PVC																			
Condition	OK																			
Reference Mark in Place?	NO																			
<b>Water Level Measurements</b>																				
WLM:	Depth to Water	6' 7" (2)	5' 5 1/2"	5' 3/4"	5' 10"															
	Total depth	11' 7"	-	-	-															
Comments:																				
	didn't know quality																			

- clear day/slight breeze, no rain  
 - site next to wetlands

## VIII. COMPLIANCE STATUS SUMMARY

As a result of this Comprehensive Ground Water Monitoring Evaluation, the following violations and deficiencies of rules 3745-65-90 through 3745-65-75(F) of the Ohio Administrative Code have been identified concerning the ground water monitoring program conducted by Moritz Incorporated. Each violation or deficiency is cited below with explanation of the nature of occurrence provided. For additional information, the CME report text and the attached technical and regulatory checklists in Appendices A and A-1 should be consulted.

### VIOLATIONS

#### 3745-65-90 (A) and (B)

The Moritz Inc., has failed to implement and operate a ground water monitoring system capable of determining the facility's impact on the uppermost aquifer underlying the facility as required by rule 3745-65-90 (A) and (B).

The facility has not designed a monitoring system with sufficient knowledge of the hydrogeologic conditions present beneath the site and within the immediate vicinity of the facilities hazardous waste unit.

#### 3745-65-91 (A) (1) (a)

Moritz Inc., has failed to demonstrate that the "upgradient" well is representative of background water quality in the uppermost aquifer near the facility as required by 3745-65-91 (A) (1) (a)

MW #1 is not upgradient from the land disposal unit most of the year, as indicated by flow direction maps submitted by Moritz. Also, the integrity of sample results from MW #1 is questionable because of the cracked concrete, loose seal, and loose collar.

#### 3745-65-91 (A) (2)

Moritz Inc., has failed to install a minimum of 3 downgradient wells that are capable of immediately detecting any statistically significant amounts of hazardous waste or hazardous waste constituents that may migrate from the waste unit to the uppermost aquifer as required by 3745-65-91 (A) (2) of the Ohio Administrative Code.

Downgradient wells #2, #3, and #4 are not sufficiently located downgradient of the facility to intercept the northern component of the ground water flow. No boring logs or hydrogeologic information has been submitted to determine if the well screens are at appropriate depths to enable representative ground water samples to be collected.

The monitoring wells may not be installed at depths capable of providing samples containing site-specific waste constituents (i.e. petroleum distillates, xylene, and toluene) that may be migrating from the waste management area. The Sampling and Analysis Plan indicates that the monitoring wells, which have five-foot screens, were installed "to a depth of five feet (5') below the uppermost ground water table." Since the water table likely was near its seasonal lowest point in June, when the wells were constructed, the water table may be above the reach of the well screens through out much of the year. If so, then the wells do not meet the requirements of 3745-65-91 (A) (2), which states that the "number, locations, and depths shall ensure that such wells immediately detect" any migrating waste constituents.

3745-65-91 (C)

Moritz Inc., has failed to demonstrate that the monitoring wells are installed in a manner that maintains the integrity of the monitoring well borehole as required by 3745-65-91 (C).

No well logs or detailed description have been submitted to determine the adequacy of the well construction and installation. The concrete pad around MW #1 was found to be badly damaged and the well collar was not secure. Also MW #1 is located below grade without appropriate seal to prevent surface water from entering into the annul vs space between the inner and outer well casing. Upon removal of the protective plate, the inner-casing and cap were found to be covered with surface water.

OAC 3745-65-92 (A)

The Moritz Inc., has failed to keep a copy of the Sampling and Analysis Plan at the facility as required by rule 3745-65-92 (A)

OAC 3745-65-92 (A) through (E)

The Moritz Inc., has failed to determine the concentrations of parameters characterizing the suitability of ground water, parameters establishing ground water quality, and parameters used as indicator parameters as described by 3745-65-92 (B) (1), (2), and (3) of the Ohio Administrative Code. In addition Moritz Inc., has failed to establish background water quality as required by 3745-65-92 (C) of the Ohio Administrative Code and conduct semi-annual sampling events as required by 3745-65-92 (D). Elevation measurements must be obtained at each sampling event as required by 3745-65-92 (E) of the Ohio Administrative Code.

Moritz was designated as a land disposal unit subject to the ground water rules on May 7, 1987. Moritz closure plan was approved April 26, with the condition that a ground water monitoring plan be implemented. Ground water monitoring wells were installed in June of 91, therefore the company has had sufficient time to evaluate the system, establish background water quality and conduct semi-annual sampling events in accordance to the rules.

3745-65-93 (B) through (F) and 3745-65-94.

Moritz Inc. has not conducted any sampling events as required by OAC 3745-65-92, and is therefore in violation of rule 3745-65-93 (B) through (F) and 3745-65-94 of the Ohio Administrative code.

Moritz Inc. failed to evaluate/respond and keep records/report ground water quality and water elevation data as required by 3745-65-93 (B) through (F) and 3745-65-94 of the Ohio Administrative Code, respectively.

3745-65-75 (F)

Moritz Inc. has failed to submit an annual report by March 1 for 1992 and 1993 as required by 3745-65-75 (F) of the Ohio Administrative Code.

#### DEFICIENCIES

1. The following are observations noted during the CME site inspection regarding the maintenance of the monitoring wells at the facility:
  - a. No surveyors' mark was visible on any of the detection monitor wells.
  - b. No identifying information on Monitoring Well #4 or Monitoring Well #2.

## IX. APPENDICES



## APPENDIX A

COMPREHENSIVE GROUND-WATER MONITORING  
EVALUATION WORKSHEET

The following worksheets have been designed to assist the enforcement officer/technical reviewer in evaluating the ground-water monitoring system an owner/operator uses to collect and analyze samples of ground water. The focus of the worksheets is technical adequacy as it relates to obtaining and analyzing representative samples of ground water. The basis of the worksheets is the final RCRA Ground Water Monitoring Technical Enforcement Guidance Document which describes in detail the aspects of ground-water monitoring which EPA deems essential to meet the goals of RCRA. Appendix A is not a regulatory checklist. Specific technical deficiencies in the monitoring system can, however, be related to the regulations as illustrated in Figure 4.3 taken from the RCRA Ground-Water Monitoring Compliance Order Guide (COG) (included at the end of the appendix). The enforcement officer, in developing an enforcement order, should relate the technical assessment from the worksheets to the regulations using Figure 4.3 from the COG as a guide.

Comprehensive Ground-Water Monitoring Evaluation	Y/N
I. Office Evaluation Technical Evaluation of the Design of the Ground-Water Monitoring System	
A. Review of Relevant Documents	
1. What documents were obtained prior to conducting the inspection:	
a. RCRA Part A permit application?	N
b. RCRA Part B permit application?	N
c. Correspondence between the owner/operator and appropriate agencies or citizen's groups?	Y
d. Previously conducted facility inspection reports?	Y
e. Facility's contractor reports?	Y
f. Regional hydrogeologic, geologic, or soil reports?	Y
g. The facility's Sampling and Analysis Plan?	Y
h. Ground-water Assessment Program Outline (or Plan, if the facility is in assessment monitoring)?	Y
i. Other (specify) _____	N

Y = YES

N = NO

N S = NOT SPECIFIED

\* = COMMENT NUMBER

OWPE

A-1

	Y/N
<b>B. Evaluation of the Owner/Operator's Hydrogeologic Assessment</b>	
1. Did the owner/operator use the following direct techniques in the hydrogeologic assessment:	
a. Logs of the soil borings/rock corings (documented by a professional geologist, soil scientist, or geotechnical engineer)?	Y *1
b. Materials tests (e.g., grain-size analyses, standard penetration tests, etc.)?	N
c. Piezometer installation for water level measurements at different depths?	N
d. Slug tests?	N
e. Pump tests?	N
f. Geochemical analyses of soil samples?	Y
g. Other (specify) (e.g., hydrochemical diagrams and wash analysis)	N
2. Did the owner/operator use the following indirect techniques to supplement direct technique data:	
a. Geophysical well logs?	N
b. Tracer studies?	N
c. Resistivity and/or electromagnetic conductance?	Y
d. Seismic Survey?	N
e. Hydraulic conductivity measurements of cores?	N
f. Aerial photography?	N
g. Ground penetrating radar?	N
h. Other (specify)	N
3. Did the owner/operator document and present the raw data from the site hydrogeologic assessment?	Y
4. Did the owner/operator document methods (criteria) used to correlate and analyze the information?	Y
5. Did the owner/operator prepare the following:	
a. Narrative description of geology?	Y
b. Geologic cross sections?	N
c. Geologic and soil maps?	N
d. Boring/coring logs?	Y *2
e. Structure contour maps of the differing water bearing zone and confining layers?	N
f. Narrative description and calculation of ground-water flows?	Y *3

	Y/N
g. Water table/potentiometric map?	Y*4
h. Hydrologic cross sections?	N
6. Did the owner/operator obtain a regional map of the area and delineate the facility?	Y
If yes, does this map illustrate:	
a. Surficial geology features?	N
b. Streams, rivers, lakes, or wetlands near the facility?	N
c. Discharging or recharging wells near the facility?	N
7. Did the owner/operator obtain a regional hydrogeologic map?	N
If yes, does this hydrogeologic map indicate:	
a. Major areas of recharge/discharge?	N
b. Regional ground-water flow direction?	N
c. Potentiometric contours which are consistent with observed water level elevations?	N
8. Did the owner/operator prepare a facility site map?	Y
If yes, does the site map show:	
a. Regulated units of the facility (e.g., landfill areas, impoundments)?	Y
b. Any seeps, springs, streams, ponds, or wetlands?	N
c. Location of monitoring wells, soil borings, or test pits?	Y
d. How many regulated units does the facility have? <u>1</u>	
If more than one regulated unit then,	
• Does the waste management area encompass all regulated units?	N/A
• Is a waste management area delineated for each regulated unit?	N/A
C. Characterization of Subsurface Geology of Site	
1. Soil boring/test pit program:	Y
a. Were the soil borings/test pits performed under the supervision of a qualified professional?	Y*1
b. Did the owner/operator provide documentation for selecting the spacing for borings?	Y
c. Were the borings drilled to the depth of the first confining unit below the uppermost zone of saturation or ten feet into bedrock?	N
d. Indicate the method(s) of drilling:	
Continuous Flight Auger	

	Y/N
Auger (hollow or solid stem) <u>Y- hollow</u>	
Mud rotary <u>      </u>	
Reverse rotary <u>      </u>	
Cable tool <u>      </u>	
Jetting <u>      </u>	
Other (specify) <u>      </u>	
e. Were continuous sample corings taken?	
f. How were the samples obtained (check method[s])	
• Split spoon <u>X</u>	
• Shelby tube, or similar <u>      </u>	
• Rock coring <u>      </u>	
• Ditch sampling <u>      </u>	
• Other (explain) <u>      </u>	
g. Were the continuous sample corings logged by a qualified professional in geology?	N/A *5
h. Does the field boring log include the following information:	
• Hole name/number?	N/A *6
• Date started and finished?	N
• Driller's name?	N
• Hole location (i.e., map and elevation)?	N
• Drill rig type and bit/auger size?	N
• Gross petrography (e.g., rock type) of each geologic unit?	N
• Gross mineralogy of each geologic unit?	N
• Gross structural interpretation of each geologic unit and structural features (e.g., fractures, gouge material, solution channels, buried streams or valleys, identification of depositional material)?	N
• Development of soil zones and vertical extent and description of soil type?	N
• Depth of water bearing unit(s) and vertical extent of each?	N
• Depth and reason for termination of borehole?	N
• Depth and location of any contaminant encountered in borehole?	N
• Sample location/number?	N
• Percent sample recovery?	N
• Narrative descriptions of:	
—Geologic observations?	N
—Drilling observations?	N
i. Were the following analytical tests performed on the core samples:	
• Mineralogy (e.g., microscopic tests and x-ray diffraction)?	N
• Petrographic analysis:	
—degree of crystallinity and cementation of matrix?	N
—degree of sorting, size fraction (i.e., sieving), textural variations?	N
—rock type(s)?	N

	Y/N
• location of borehole?	N/A
• depth of termination?	N/A
• location of screen (if applicable)?	N/A
• depth of zone(s) of saturation?	N/A
• backfill procedure?	N/A
3. Did the owner/operator provide a topographic map which was constructed by a licensed surveyor?	N
4. Does the topographic map provide:	
a. contours at a maximum interval of two-feet?	N/A
b. locations and illustrations of man-made features (e.g., parking lots, factory buildings, drainage ditches, storm drain, pipelines, etc.)?	N/A
c. descriptions of nearby water bodies?	N/A
d. descriptions of off-site wells?	N/A
e. site boundaries?	N/A
f. individual RCRA units?	N/A
g. delineation of the waste management area(s)?	N/A
h. well and boring locations?	N/A
5. Did the owner/operator provide an aerial photograph depicting the site and adjacent off-site features?	N
6. Does the photograph clearly show surface water bodies, adjacent municipalities, and residences and are these clearly labelled?	N/A
<b>F. Identification of Ground-Water Flowpaths</b>	
1. Ground-water flow direction	
a. Was the well casing height measured by a licensed surveyor to the nearest 0.01 foot?	Y
b. Were the well water level measurements taken within a 24 hour period?	Y*7
c. Were the well water level measurements taken to the nearest 0.01 foot?	Y
d. Were the well water levels allowed to stabilize after construction and development for a minimum of 24 hours prior to measurements?	Y
e. Was the water level information obtained from (check appropriate one):	
• multiple piezometers placed in single borehole? _____	
• vertically nested piezometers in closely spaced separate boreholes? _____	
• monitoring wells? _____	Y

	Y/N
—soil type?	
—approximate bulk geochemistry?	N
—existence of microstructures that may effect or indicate fluid flow?	N
• Falling head tests?	N
• Static head tests?	N
• Settling measurements?	N
• Centrifuge tests?	N
• Column drawings?	N
<b>D. Verification of Subsurface Geological Data</b>	
1. Has the owner/operator used indirect geophysical methods to supplement geological conditions between borehole locations?	N
2. Do the number of borings and analytical data indicate that the confining layer displays a low enough permeability to impede the migration of contaminants to any stratigraphically lower water-bearing units?	N
3. Is the confining layer laterally continuous across the entire site?	UNK
4. Did the owner/operator consider the chemical compatibility of the site-specific waste types and the geologic materials of the confining layer?	N
5. Did the geologic assessment address or provide means for resolution of any information gaps of geologic data?	N
6. Do the laboratory data corroborate the field data for petrography?	N
7. Do the laboratory data corroborate the field data for mineralogy and subsurface geochemistry?	N
<b>E. Presentation of Geologic Data</b>	
1. Did the owner/operator present geologic cross sections of the site?	N
2. Do cross sections:	
a. identify the types and characteristics of the geologic materials present?	N/A
b. define the contact zones between different geologic materials?	N/A
c. note the zones of high permeability or fracture?	N/A
d. give detailed borehole information including:	

	Y/N
f. Did the owner/operator provide construction details for the piezometers?	
g. How were the static water levels measured (check method[s]).	Y*8
• Electric water sounder <u>X</u>	
• Wetted tape <u>      </u>	
• Air line <u>      </u>	
• Other (explain) <u>      </u>	
h. Was the well water level measured in wells with equivalent screened intervals at an equivalent depth below the saturated zone?	Y
i. Has the owner/operator provided a site water table (potentiometric) contour map?	N
— If yes, <u>      </u>	
• Do the potentiometric contours appear logical and accurate based on topography and presented data? (Consult water level data)	N
• Are ground-water flow-lines indicated?	N
• Are static water levels shown?	N
• Can hydraulic gradients be estimated?	Y
j. Did the owner/operator develop hydrologic cross sections of the vertical flow component across the site using measurements from all wells?	N
k. Do the owner/operator's flow nets include:	
• piezometer locations?	N/A
• depth of screening?	N/A
• width of screening?	N/A
• measurements of water levels from all wells and piezometers?	N/A
2. Seasonal and temporal fluctuations in ground-water	
a. Do fluctuations in static water levels occur? If yes, are the fluctuations caused by any of the following:	Y
— Off-site well pumping	N/A
— Tidal processes or other intermittent natural variations (e.g., river stage, etc.)	N/A
— On-site well pumping	N/A
— Off-site, on-site construction or changing land use patterns	N/A
— Deep well injection	N/A
— Seasonal variations	Y
— Other (specify) <u>      </u>	N/A
b. Has the owner/operator documented sources and patterns that contribute to or affect the ground-water patterns below the waste management area?	N
c. Do water level fluctuations alter the general ground-water gradients and flow directions?	Y
d. Based on water level data, do any head differentials occur that may indicate a vertical flow component in the saturated zone?	N

	Y/N
e. Did the owner/operator implement means for gauging long term effects on water movement that may result from on-site or off-site construction or changes in land-use patterns?	N
3. Hydraulic conductivity	
a. How were hydraulic conductivities of the subsurface materials determined?	N/A
• Single-well tests (slug tests)?	N/A
• Multiple-well tests (pump tests)	N/A
• Other (specify) _____	N/A
b. If single-well tests were conducted, were they done by:	
• Adding or removing a known volume of water?	N/A
• Pressurizing well casing?	N/A
c. If single well tests were conducted in a highly permeable formation, were pressure transducers and high-speed recording equipment used to record the rapidly changing water levels?	N/A
d. Since single well tests only measure hydraulic conductivity in a limited area, were enough tests run to ensure a representative measure of conductivity in each hydrogeologic unit?	N/A
e. Are the owner/operator's slug test data (if applicable) consistent with existing geologic information (e.g., boring logs)?	N/A
f. Were other hydraulic conductivity properties determined?	N/A
g. If yes, provide any of the following data, if available:	
• Transmissivity _____	
• Storage coefficient _____	
• Leakage _____	
• Permeability _____	
• Porosity _____	
• Specific capacity _____	
• Other (specify) _____	N/A
4. Identification of the uppermost aquifer	
a. Has the extent of the uppermost saturated zone (aquifer) in the facility area been defined? If yes,	N*6
• Are soil boring/test pit logs included?	N
• Are geologic cross-sections included?	N
b. Is there evidence of confining (competent, unfractured, continuous, and low permeability) layers beneath the site? If yes,	N
• how was continuity demonstrated? _____	N/A
c. What is the hydraulic conductivity of the confining unit? (cm/sec.)	N/A
d. How was it determined?	N/A

	Y/N
<p>e. Does potential for other hydraulic communication exist (e.g., lateral discontinuity between geologic units, facies changes, fracture zones, cross cutting structures, or chemical corrosion/alteration of geologic units by leachate)? If yes or no, what is the rationale?</p> <p>_____</p> <p>_____</p> <p>Insufficient information has been submitted</p>	UNK
<p><b>G. Office Evaluation of the Facility's Ground-Water Monitoring System—</b>  <b>Monitoring Well Design and Construction:</b></p> <p>These questions should be answered for each different well design present at the facility.</p> <p><b>1. Drilling Methods</b></p> <p>a. What drilling method was used for the well?</p> <ul style="list-style-type: none"> <li>• Hollow-stem auger <input checked="" type="checkbox"/></li> <li>• Solid-stem auger <input type="checkbox"/></li> <li>• Mud rotary (water) <input type="checkbox"/></li> <li>• Air rotary <input type="checkbox"/></li> <li>• Reverse rotary <input type="checkbox"/></li> <li>• Cable tool <input type="checkbox"/></li> <li>• Jetting <input type="checkbox"/></li> <li>• Air drill w/ casing hammer <input type="checkbox"/></li> <li>• Other (specify) _____</li> </ul> <p>b. Were any cutting fluids (including water) or additives used during drilling? If yes, specify:</p> <ul style="list-style-type: none"> <li>• Type of drilling fluid _____</li> <li>• Source of water used _____</li> <li>• Foam _____</li> <li>• Polymers _____</li> <li>• Other _____</li> </ul> <p>c. Was the cutting fluid, or additive, identified?</p> <p>d. Was the drilling equipment steam-cleaned prior to drilling the well?</p> <ul style="list-style-type: none"> <li>• Other methods _____</li> </ul> <p>e. Was compressed air used during drilling? If yes,</p> <ul style="list-style-type: none"> <li>• was the air filtered to remove oil?</li> </ul> <p>f. Did the owner/operator document procedure for establishing the potentiometric surface? If yes,</p> <ul style="list-style-type: none"> <li>• how was the location established? measured water level after drilling</li> </ul> <p>g. Formation samples</p>	<p>N</p> <p>N/A</p> <p>Y</p> <p>N</p> <p>Y</p> <p>Y</p>

		Y/N
• Were formation samples collected initially during drilling?		Y
• Were any cores taken continuously?		UNK
• If not, at what interval were samples taken?		N/A
• How were the samples obtained? —Split spoon —Shelby tube —Core drill —Other (specify)		N/A
• Identify if any physical and/or chemical tests were performed on the formation samples (specify) _____ _____ _____		N/A
2. Monitoring Well Construction Materials		
a. Identify construction materials (by number) and diameters (ID/OD)		
	<u>Material</u>	<u>Diameter</u>
• Primary Casing	PVC	2"
• Secondary or outside casing (double construction)	N/A	N/A
• Screen	PVC	2"
b. How are the sections of casing and screen connected?		
• Pipe sections threaded		Y
• Couplings (friction) with adhesive or solvent		N
• Couplings (friction) with retainer screws		N
• Other (specify)		N/A
c. Were the materials steam-cleaned prior to installation?		
• If no, how were the materials cleaned?		Y
3. Well Intake Design and Well Development		
a. Was a well intake screen installed?		
• What is the length of the screen for the well?		Y
5'		
• Is the screen manufactured?		Y
b. Was a filter pack installed?		
• What kind of filter pack was employed?		Y
Coarse Sand		
• Is the filter pack compatible with formation materials?		Y
• How was the filter pack installed?		
Not reported		

	Y/N
• What are the dimensions of the filter pack? 7' x 8" - 2"	
• Has a turbidity measurement of the well water ever been made?	N
• Have the filter pack and screen been designed for the in-situ materials?	N
c. Well development	
• Was the well developed?	
• What technique was used for well development?	
<input checked="" type="checkbox"/> Surge block <input type="checkbox"/> Bailer <input type="checkbox"/> Air surging <input type="checkbox"/> Water pumping <input type="checkbox"/> Other (specify)	
4. Annular Space Seals	
a. What is the annular space in the saturated zone directly above the filter pack filled with:	
<input checked="" type="checkbox"/> Sodium bentonite (specify type and grit) pellets <input type="checkbox"/> Cement (specify neat or concrete) <input type="checkbox"/> Other (specify)	
b. Was the seal installed by:	
<input type="checkbox"/> Dropping material down the hole and tamping <input type="checkbox"/> Dropping material down the inside of hollow-stem auger <input type="checkbox"/> Tremie pipe method <input checked="" type="checkbox"/> Other (specify) Not reported	
c. Was a different seal used in the unsaturated zone? If yes,	Unk
• Was this seal made with?	
<input checked="" type="checkbox"/> Sodium bentonite (specify type and grit) Sand/Bentonite <input type="checkbox"/> Cement (specify neat or concrete)- Other (specify)	
• Was this seal installed by?	
<input type="checkbox"/> Dropping material down the hole and tamping <input type="checkbox"/> Dropping material down the inside of hollow stem auger <input checked="" type="checkbox"/> Other (specify) Not Reported	
d. Is the upper portion of the borehole sealed with a concrete cap to prevent infiltration from the surface?	Y
e. Is the well fitted with an above-ground protective device and bumper guards?	N
f. Has the protective cover been installed with locks to prevent tampering?	
	N *9

	Y/N
<b>H. Evaluation of the Facility's Detection Monitoring Program</b>	
<b>1. Placement of Downgradient Detection Monitoring Wells</b>	
a. Are the ground-water monitoring wells or clusters located immediately adjacent to the waste management area?	N *17
b. How far apart are the detection monitoring wells? 50' (est.)	
c. Does the owner/operator provide a rationale for the location of each monitoring well or cluster?	N *17
d. Does the owner/operator identify the well screen lengths of each monitoring well or cluster?	Y
e. Does the owner/operator provide an explanation for the well screen lengths of each monitoring well or cluster?	Y
f. Do the actual locations of monitoring wells or clusters correspond to those identified by the owner/operator?	Y
<b>2. Placement of Upgradient Monitoring Wells</b>	
a. Has the owner/operator documented the location of each upgradient monitoring well or cluster?	Y
b. Does the owner/operator provide an explanation for the location(s) of the upgradient monitoring wells?	N *18
c. What length screen has the owner/operator employed in the background monitoring well(s)?	7'
d. Does the owner/operator provide an explanation for the screen length(s) chosen?	Y
e. Does the actual location of each background monitoring well or cluster correspond to that identified by the owner/operator?	Y
<b>L. Office Evaluation of the Facility's Assessment Monitoring Program</b>	
<b>1. Does the assessment plan specify:</b>	
a. The number, location, and depth of wells?	Y
b. The rationale for their placement and identify the basis that will be used to select subsequent sampling locations and depths in later assessment phases?	Y
<b>2. Does the list of monitoring parameters include all hazardous waste constituents from the facility?</b>	Y

	Y/N
a. Does the water quality parameter list include other important indicators not classified as hazardous waste constituents?	
b. Does the owner/operator provide documentation for the listed wastes which are not included?	Y
	N
3. Does the owner/operator's assessment plan specify the procedures to be used to determine the rate of constituent migration in the ground-water?	Y
4. Has the owner/operator specified a schedule of implementation in the assessment plan?	N *19
5. Have the assessment monitoring objectives been clearly defined in the assessment plan?	Y
a. Does the plan include analysis and/or re-evaluation to determine if significant contamination has occurred in any of the detection monitoring wells?	N *19
b. Does the plan provide for a comprehensive program of investigation to fully characterize the rate and extent of contaminant migration from the facility?	Y
c. Does the plan call for determining the concentrations of hazardous wastes and hazardous waste constituents in the ground water?	Y
d. Does the plan employ a quarterly monitoring program?	Y
6. Does the assessment plan identify the investigatory methods that will be used in the assessment phase?	Y
a. Is the role of each method in the evaluation fully described?	Y
b. Does the plan provide sufficient descriptions of the direct methods to be used?	Y
c. Does the plan provide sufficient descriptions of the indirect methods to be used?	N/A
d. Will the method contribute to the further characterization of the contaminant movement?	N *19
7. Are the investigatory techniques utilized in the assessment program based on direct methods?	Y
a. Does the assessment approach incorporate indirect methods to further support direct methods?	N
b. Will the planned methods called for in the assessment approach ultimately meet performance standards for assessment monitoring?	unk
c. Are the procedures well defined?	N *19
d. Does the approach provide for monitoring wells similar in design and construction as the detection monitoring wells?	Y

	Y/N
e. Does the approach employ taking samples during drilling or collecting core samples for further analysis?	Y
8. Are the indirect methods to be used based on reliable and accepted geophysical techniques?	N/A
a. Are they capable of detecting subsurface changes resulting from contaminant migration at the site?	N/A
b. Is the measurement at an appropriate level of sensitivity to detect ground-water quality changes at the site?	N/A
c. Is the method appropriate considering the nature of the subsurface materials?	N/A
d. Does the approach consider the limitations of these methods?	N/A
e. Will the extent of contamination and constituent concentration be based on direct methods and sound engineering judgment? (Using indirect methods to substantiate the findings.)	N/A
9. Does the assessment approach incorporate any mathematical modeling to predict contaminant movement?	N
a. Will site specific measurements be utilized to accurately portray the subsurface?	N/A
b. Will the derived data be reliable?	N/A
c. Have the assumptions been identified?	N/A
d. Have the physical and chemical properties of the site specific wastes and hazardous waste constituents been identified?	N/A
<b>J. Conclusions</b>	
<b>1. Subsurface geology</b>	
a. Have sufficient data been collected to adequately define petrography and petrographic variation?	N
b. Has the subsurface geochemistry been adequately defined?	N
c. Was the boring/coring program adequate to define subsurface geologic variation?	N*6
d. Was the owner/operator's narrative description complete and accurate in its interpretation of the data?	N *10
e. Does the geologic assessment address or provide means to resolve any information gaps?	N
<b>2. Ground-water flowpaths</b>	
a. Did the owner/operator adequately establish the horizontal and vertical components of ground water flow?	N

	Y/N
b. Were appropriate methods used to establish ground-water flowpaths?	Y
c. Did the owner/operator provide accurate documentation?	unk
d. Are the potentiometric surface measurements valid?	Y
e. Did the owner/operator adequately consider the seasonal and temporal effects on the ground-water?	Y
f. Were sufficient hydraulic conductivity tests performed to document lateral and vertical variation in hydraulic conductivity in the entire hydrogeologic subsurface below the site?	N*20
3. Uppermost Aquifer	
a. Did the owner/operator adequately define the upper-most aquifer?	N*6
4. Monitoring Well Construction and Design	
a. Do the design and construction of the owner/operator's ground-water monitoring wells permit depth discrete ground-water samples to be taken?	N
b. Are the samples representative of ground-water quality?	N unk
c. Are the ground-water monitoring wells structurally stable?	Y*21
d. Does the ground-water monitoring well's design and construction permit an accurate assessment of aquifer characteristics?	N
5. Detection Monitoring	
a. Downgradient Wells <ul style="list-style-type: none"> <li>Do the location, and screen lengths of the ground-water monitoring wells or clusters in the detection monitoring system allow the immediate detection of a release of hazardous waste or constituents from the hazardous waste management area to the uppermost aquifer?</li> </ul>	N*17
b. Upgradient Wells <ul style="list-style-type: none"> <li>Do the location and screen lengths of the upgradient (background) ground-water monitoring wells ensure the capability of collecting ground-water samples representative of upgradient (background) ground-water quality including any ambient heterogenous chemical characteristics?</li> </ul>	N*18
6. Assessment Monitoring	
a. Has the owner/operator adequately characterized site hydrogeology to determine contaminant migration?	N
b. Is the detection monitoring system adequately designed and constructed to immediately detect any contaminant release?	N

	Y/N
c. Are the procedures used to make a first determination of contamination adequate?	Y
d. Is the assessment plan adequate to detect, characterize, and track contaminant migration?	N/A
e. Will the assessment monitoring wells, given site hydrogeologic conditions, define the extent and concentration of contamination in the horizontal and vertical planes?	N/A
f. Are the assessment monitoring wells adequately designed and constructed?	N/A
g. Are the sampling and analysis procedures adequate to provide a true measurement of contamination?	Y
h. Do the procedures used for evaluation of assessment monitoring data result in determinations of the rate of migration, extent of migration, and hazardous constituent composition of the contaminant plume?	N/A
i. Are the data collected at sufficient frequency and duration to adequately determine the rate of migration?	N/A
j. Is the schedule of implementation adequate?	N * 19
k. Is the owner/operator's assessment monitoring plan adequate?	N * 19
• If the owner/operator had to implement his assessment monitoring plan was it implemented satisfactorily?	N/A
<b>II. Field Evaluation</b>	
<b>A. Ground-Water Monitoring System</b>	
1. Are the numbers, depths, and locations of monitoring wells in agreement with those reported in the facility's monitoring plan? (See Section 3.2.3.)	Y
<b>B. Monitoring Well Construction</b>	
1. Identify construction material material diameter	
a. Primary Casing <u>PVC</u>	
b. Secondary or outside casing <u>Steel</u>	
2. Is the upper portion of the borehole sealed with concrete to prevent infiltration from the surface?	Y
3. Is the well fitted with an above-ground protective device?	Y
4. Is the protective cover fitted with locks to prevent tampering? If a facility utilizes more than a single well design, answer the above questions for each well design?	Y

	Y/N
<b>III. Review of Sample Collection Procedures</b>	
<b>A. Measurement of Well Depths /Elevation</b>	
1. Are measurements of both depth to standing water and depth to the bottom of the well made?	N/A *11
2. Are measurements taken to the 0.01 foot?	N/A
3. What device is used?	N/A
4. Is there a reference point established by a licensed surveyor?	N/A
5. Is the measuring equipment properly cleaned between well locations to prevent cross contamination?	N/A
<b>B. Detection of Immiscible Layers</b>	
1. Are procedures used which will detect light phase immiscible layers?	N/A
2. Are procedures used which will detect heavy phase immiscible layers?	N/A
<b>C. Sampling of Immiscible Layers</b>	
1. Are the immiscible layers sampled separately prior to well evacuation?	N/A
2. Do the procedures used minimize mixing with water soluble phases?	N/A
<b>D. Well Evacuation</b>	
1. Are low yielding wells evacuated to dryness?	N/A
2. Are high yielding wells evacuated so that at least three casing volumes are removed?	N/A
3. What device is used to evacuate the wells?	N/A
4. If any problems are encountered (e.g., equipment malfunction) are they noted in a field logbook?	N/A

	Y/N
<b>E. Sample Withdrawal</b>	
1. For low yielding wells, are samples for volatiles, pH, and oxidation/reduction potential drawn first after the well recovers?	N/A *11
2. Are samples withdrawn with either fluoro-carbon/resins or stainless steel (316, 304 or 2205) sampling devices?	N/A
3. Are sampling devices either bottom valve bailers or positive gas displacement bladder pumps?	N/A
4. If bailers are used, is fluorocarbon/resin coated wire, single strand stainless steel wire, or monofilament used to raise and lower the bailer?	N/A
5. If bladder pumps are used, are they operated in a continuous manner to prevent aeration of the sample?	N/A
6. If bailers are used, are they lowered slowly to prevent degassing of the water?	N/A
7. If bailers are used, are the contents transferred to the sample container in a way that minimizes agitation and aeration?	N/A
8. Is care taken to avoid placing clean sampling equipment on the ground or other contaminated surfaces prior to insertion into the well?	N/A
9. If dedicated sampling equipment is not used, is equipment disassembled and thoroughly cleaned between samples?	N/A
10. If samples are for inorganic analysis, does the cleaning procedure include the following sequential steps: a. Nonphosphate detergent wash? b. Dilute acid rinse ( $\text{HNO}_3$ or $\text{HCl}$ )? c. Tap water rinse? d. Type II reagent grade water?	N/A
11. If samples are for organic analysis, does the cleaning procedure include the following sequential steps: a. Nonphosphate detergent wash?	N/A
b. Tap water rinse?	N/A
c. Distilled/deionized water rinse?	N/A
d. Acetone rinse?	N/A
e. Pesticide-grade hexane rinse?	N/A

	Y/N
12. Is sampling equipment thoroughly dry before use?	N/A
13. Are equipment blanks taken to ensure that sample cross-contamination has not occurred?	N/A
14. If volatile samples are taken with a positive gas displacement bladder pump, are pumping rates below 100 ml/min?	N/A
<b>F. In-situ or Field Analyses</b>	
1. Are the following labile (chemically unstable) parameters determined in the field:	
a. pH?	N/A *11
b. Temperature?	N/A
c. Specific conductivity?	N/A
d. Redox potential?	N/A
e. Chlorine?	N/A
f. Dissolved oxygen?	N/A
g. Turbidity?	N/A
h. Other (specify) _____	N/A
2. For in-situ determinations, are they made after well evacuation and sample removal?	N/A
3. If sample is withdrawn from the well, is parameter measured from a split portion?	N/A
4. Are monitoring equipment calibrated according to manufacturer's specifications and consistent with SW-846?	N/A
5. Are the date, procedure, and maintenance for equipment calibration documented in the field logbook?	N/A
<b>IV. Review of Sample Preservation and Handling Procedures</b>	
<b>A. Sample Containers</b>	
1. Are samples transferred from the sampling device directly to their compatible containers?	N/A *11

	Y/N
2. Are sample containers for metals (inorganics) analyses polyethylene with polypropylene caps?	N/A
3. Are sample containers for organics analysis glass bottles with fluorocarbonresin-lined caps?	N/A
4. If glass bottles are used for metals samples are the caps fluorocarbonresin-lined?	N/A
5. Are the sample containers for metal analyses cleaned using these sequential steps:	
a. Nonphosphate detergent wash?	N/A
b. 1:1 nitric acid rinse?	N/A
c. Tap water rinse?	N/A
d. 1:1 hydrochloric acid rinse?	N/A
e. Tap water rinse?	N/A
f. Distilled/deionized water rinse?	N/A
6. Are the sample containers for organic analyses cleaned using these sequential steps:	
a. Nonphosphate detergent/hot water wash?	N/A
b. Tap water rinse?	N/A
c. Distilled/deionized water rinse?	N/A
d. Acetone rinse?	N/A
e. Pesticide-grade hexane rinse?	N/A
7. Are trip blanks used for each sample container type to verify cleanliness?	N/A
<b>B. Sample Preservation Procedures</b>	
1. Are samples for the following analyses cooled to 4°C:	
a. TOC?	N/A *11
b. TOX?	N/A
c. Chloride?	N/A
d. Phenols?	N/A
e. Sulfate?	N/A
f. Nitrate?	N/A
g. Coliform bacteria?	N/A
h. Cyanide?	N/A
i. Oil and grease?	N/A
j. Hazardous constituents ( 261, Appendix VIII)	N/A

	Y/N
2. Are samples for the following analyses field acidified to pH <2 with HNO <sub>3</sub> :	
a. Iron?	N/A
b. Manganese?	N/A
c. Sodium?	N/A
d. Total metals?	N/A
e. Dissolved metals?	N/A
f. Fluoride?	N/A
g. Endrin?	N/A
h. Lindane?	N/A
i. Methoxychlor?	N/A
j. Toxaphene?	N/A
k. 2,4, D?	N/A
l. 2,4,5 TP Silvex?	N/A
m. Radium?	N/A
n. Gross alpha?	N/A
o. Gross beta?	N/A
3. Are samples for the following analyses field acidified to pH <2 with H <sub>2</sub> SO <sub>4</sub> :	
a. Phenols?	N/A
b. Oil and grease?	N/A
4. Is the sample for TOC analysis field acidified to pH <2 with HCl?	N/A
5. Is the sample for TOX analysis preserved with 1 ml of 1.1 M sodium sulfite?	N/A
6. Is the sample for cyanide analysis preserved with NaOH to pH >12?	N/A
C. Special Handling Considerations	
1. Are organic samples handled without filtering?	N/A *11
2. Are samples for volatile organics transferred to the appropriate vials to eliminate headspace over the sample?	N/A
3. Are samples for metal analysis split into two portions?	N/A
4. Is the sample for dissolved metals filtered through a 0.45 micron filter?	N/A
5. Is the second portion not filtered and analyzed for total metals?	N/A
6. Is one equipment blank prepared each day of ground-water sampling?	N/A

	Y/N
<b>V. Review of Chain-of-Custody Procedures</b>	
<b>A. Sample Labels</b>	
1. Are sample labels used?	N/A*11
2. Do they provide the following information:	
a. Sample identification number?	N/A
b. Name of collector?	N/A
c. Date and time of collection?	N/A
d. Place of collection?	N/A
e. Parameter(s) requested and preservatives used?	N/A
3. Do they remain legible even if wet?	N/A
<b>B. Sample Seals</b>	
1. Are sample seals placed on those containers to ensure samples are not altered?	N/A *11
<b>C. Field Logbook</b>	
1. Is a field logbook maintained?	N/A
2. Does it document the following:	
a. Purpose of sampling (e.g., detection or assessment)?	N/A
b. Location of well(s)?	N/A
c. Total depth of each well?	N/A
d. Static water level depth and measurement technique?	N/A
e. Presence of immiscible layers and detection method?	N/A
f. Collection method for immiscible layers and sample identification numbers?	N/A
g. Well evacuation procedures?	N/A
h. Sample withdrawal procedure?	N/A
i. Date and time of collection?	N/A
j. Well sampling sequence?	N/A
k. Types of sample containers and sample identification number(s)?	N/A
l. Preservative(s) used?	N/A
m. Parameters requested?	N/A
n. Field analysis data and method(s)?	N/A
o. Sample distribution and transporter?	N/A
p. Field observations?	N/A

—Unusual well recharge rates?	Y/N
—Equipment malfunction(s)?	N/A
—Possible sample contamination?	N/A
—Sampling rate?	N/A
D. Chain-of-Custody Record	
1. Is a chain-of-custody record included with each sample?	N/A*11
2. Does it document the following:	
a. Sample number?	N/A
b. Signature of collector?	N/A
c. Date and time of collection?	N/A
d. Sample type?	N/A
e. Station location?	N/A
f. Number of containers?	N/A
g. Parameters requested?	N/A
h. Signatures of persons involved in chain-of-custody?	N/A
i. Inclusive dates of custody?	N/A
E. Sample Analysis Request Sheet	
1. Does a sample analysis request sheet accompany each sample?	N/A*11
2. Does the request sheet document the following:	
a. Name of person receiving the sample?	N/A
b. Date of sample receipt?	N/A
c. Duplicates?	N/A
d. Analysis to be performed?	N/A
VI. Review of Quality Assurance/Quality Control	
A. Is the validity and reliability of the laboratory and field generated data ensured by a QA/QC program?	N/A*1
B. Does the QA/QC program include:	
1. Documentation of any deviation from approved procedures?	N/A*11

	Y/N
2. Documentation of analytical results for:	
a. Blanks?	N/A
b. Standards?	N/A
c. Duplicates?	N/A
d. Spiked samples?	N/A
e. Detectable limits for each parameter being analyzed?	N/A
C. Are approved statistical methods used?	N/A
D. Are QC samples used to correct data?	N/A
E. Is all data critically examined to ensure it has been properly calculated and reported?	N/A
<b>VII. Surficial Well Inspection and Field Observation</b>	
A. Are the wells adequately maintained?	N*12
B. Are the monitoring wells protected and secure?	N*13
C. Do the wells have surveyed casing elevations?	N*14
D. Are the ground-water samples turbid?	N/A
E. Have all physical characteristics of the site been noted in the inspector's field notes (i.e., surface waters, topography, surface features)?	Y
F. Has a site sketch been prepared by the field inspector with scale, north arrow, location(s) of buildings, location(s) of regulated units, locations of monitoring wells, and a rough depiction of the site drainage pattern?	Y

	Y/N	
<b>VIII. Conclusions</b>		
A. Is the facility currently operating under the correct monitoring program according to the statistical analyses performed by the current operator?	N	*15
B. Does the ground-water monitoring system, as designed and operated, allow for detection or assessment of any possible ground-water contamination caused by the facility?	N	*16
C. Does the sampling and analysis procedure permit the owner/operator to detect and, where possible, assess the nature and extent of a release of hazardous constituents to ground water from the monitored hazardous waste management facility?	N	*16
<p style="text-align: center;"><u>*COMMENTS</u></p> <ol style="list-style-type: none"> <li>1. The consultants report of July 26, 1991 is signed by a geologist but does not state that he did the work.</li> <li>2. Only soil boring logs have been submitted, monitor well logs have not.</li> <li>3. The information submitted is not acceptable because of questionable well locations.</li> <li>4. See comment 3.</li> <li>5. See Comment 1.</li> <li>6. No well logs submitted.</li> <li>7. First round, yes</li> <li>8. General construction diagram only.</li> <li>9. Inner casing, yes; outer casing, no.</li> <li>10. Discussion of well log data and subsurface geology is incomplete.</li> <li>11. Sections III, IV, V, VI- All not applicable. Owner did not have consultant on site, therefore none of these activities were undertaken, nor observed by Ohio EPA inspectors.</li> <li>12. On Well #1 seal on well cover did not keep out surface water and concrete base damaged.</li> <li>13. Wells #2, #3 and #4 not locked on outside.</li> <li>14. No surveyor's mark on casings.</li> <li>15. No analysis reported, therefore no statistical analysis done.</li> <li>16. No, because of questionable well location and questionable screening.</li> <li>17. Noted in text and violations.</li> <li>18. Background well (MW#1) is not really upgradient most of the year.</li> </ol> <p style="text-align: center;">(over)</p>		

19. Noted in text and violations.

20. No hydraulic conductivity results reported to Ohio EPA.

21. Y, #2, #3, #4 N, #1.

APPENDIX A-1

FACILITY INSPECTION FORM FOR COMPLIANCE WITH INTERIM  
STATUS STANDARDS COVERING GROUND-WATER

Company Moritz, Inc. EPA I.D. Number CHD982218489  
 Company Address: 400 Park Avenue East  
 Company Contact/Official: Denver Roof Title: Present Owner

Date of Inspection: July 28, 1993  
 Inspector's Name: Rick Cisler Branch/Organization: Ohio EPA

Type of Facility: (check appropriately)

- a) surface impoundment
- b) landfill /land disposal unit
- c) land treatment facility

Y/N

N

Y

N

\*1

\*

Ground Water Monitoring Program

1. Has a ground water monitoring plan been submitted to the Director for facilities containing a surface impoundment, landfill, land treatment facility?

Y

2. Was the ground water monitoring plan reviewed prior to the site visit? If "No," explain.

Y

A. Was the ground water plan reviewed at the facility prior to the actual site inspection?  
 If "No," explain. No copy on site

N

\*1

3. Has a ground water monitoring program (capable of determining the facility's impact on the quality of ground water in the uppermost aquifer underlying the facility) been implemented? 3745-65-90(A)

N

\*1

4. Has at least one monitoring well been installed in the uppermost aquifer hydraulically upgradient from the limit of the waste management area? 3745-65-91(A)(1)

N

\*1

A. Are sufficient ground water samples from the uppermost aquifer, representative of background ground water quality and not affected by the facility, ensured by proper well

1) Number(s)?

N

\*1

2) Location?

N

\*1

3) Depth?

UNK

APPENDIX A-1		Y/N
5. Have at least three monitoring wells been installed hydraulically downgradient at the limit of the waste handling or management area? 3745-65-91(A)(2)	N	*1
6. Have the locations of the waste handling, storage, or disposal areas been verified to conform with information in the ground water monitoring plan?	Y	
7. Do the numbers, locations, and depths of the ground water monitoring wells agree with the data in the ground water monitoring system program? If "No," explain discrepancies.	UNK	*2
8. Have all monitoring wells been cased in a manner that:		
A. Maintains the integrity of the bore hole?	N	*3
B. Is screened and packed to enable sample collection at depths where appropriate aquifer flow exists?	UNK	*4
C. Prevents contamination of samples and ground water by sealing the annular space above the sampling depth with a suitable material? 3745-65-91(C)	N	*3
9. Has a ground water sampling and analysis plan been developed? 3745-65-92(A)	Y	
A. Has it been followed?	N	
B. Is the plan kept at the facility?	N	
C. Does the plan include procedures and techniques for:		
1) Measuring ground water elevations? 3745-65-92(A)(1)	Y	
2) Detection of immiscible layers, where applicable? 3745-65-92(A)(2)	Y	
3) Collecting ground water samples including? 3745-65-92(A)(3)		
a) Well evacuation? 3745-65-92(A)(3)(a)	Y	
b) Sample withdrawal? 3745-65-92(A)(3)(b)	Y	
c) Sample equipment? 3745-65-92(A)(3)(c)	Y	
d) Sample containers and handling? 3745-65-92(A)(3)(d)	Y	
e) Sample preservation? 3745-65-92(A)(3)(e)	Y	
4) Performing field analysis, including:		
a) Procedures and forms for recording raw data and the exact location, time, and facility specific considerations associated with the data acquisitions? 3745-65-92(A)(4)(a)	Y	
b) Calibration of field instruments? 3745-65-92(A)(4)(b)	N	*5
c) Procedures for sample filtration? 3745-65-92(A)(4)(c)	Y	
5) Decontamination of equipment? 3745-65-92(A)(5)	Y	
6) Disposal of purge water? 3745-65-92(A)(6)	N	*5

Y = YES, N = NO, NA = NOT APPLICABLE  
 NS = NOT SPECIFIED, \* = COMMENT

APPENDIX A-1		Y/N
7) Ground water sample analysis of all applicable constituents associated with the facility including: 3745-65-92(A)(7)		
a) Constituents? 3745-65-92(A)(7)(a)	Y	
b) Analytical method and detection limit? 3745-65-92(A)(7)(b)	Y	
c) Sample holding time? 3745-65-92(A)(7)(c)	Y	
8) Quality assurance/quality control:		
a) Samples for field/lab/equipment blanks? 3745-65-92(A)(8)(a)	Y	
b) Duplicate samples? 3745-65-92(A)(8)(b)	Y	
c) Potential interferences? 3745-65-92(A)(8)(c)	N	*5
9) Chain of custody procedures:		
a) Standardized field tracking reporting forms to establish sample custody for the field prior to and during shipping? 3745-65-92(A)(9)(a)	Y	
b) Sample labels containing all information necessary for effective sample tracking? 3745-65-92(A)(9)(b)		
10. Have the required parameters in ground water samples been tested quarterly for the first year? 3745-65-92(B) and (C)(1).	N	*6
A. Are the ground water samples analyzed for the following:		
1) Parameters characterizing the suitability of the ground water as a drinking supply? 3745-65-92 B(1)	N	*6
2) Parameters establishing ground water quality? 3745-65-92 B(2)	N	*6
3) Parameters used as indicators of ground water contamination? 3745-65-92 B(3)	N	*6
a) Are at least four replicate measurements obtained for each sample? 3745-65-92(C)(2)	N	*6
b) Are provisions made to calculate the initial background arithmetic mean and variance of the respective parameter concentrations or values obtained from well(s) during the first year? 3745-65-92(C)(2)	N	*6
B. For facilities which have complied with first year ground water sampling and analysis requirements:		
1) Have samples been obtained and analyzed for the indicators of ground water quality at least annually? 3745-65-92(D)(1)	NA	
2) Have samples been obtained and analyzed for the indicators of ground water contamination at least semi-annually? 3745-65-92(D)(2)	NA	
C. Were ground water surface elevations determined at each monitoring well each time a sample was taken? 3745-65-92(E)	NA	

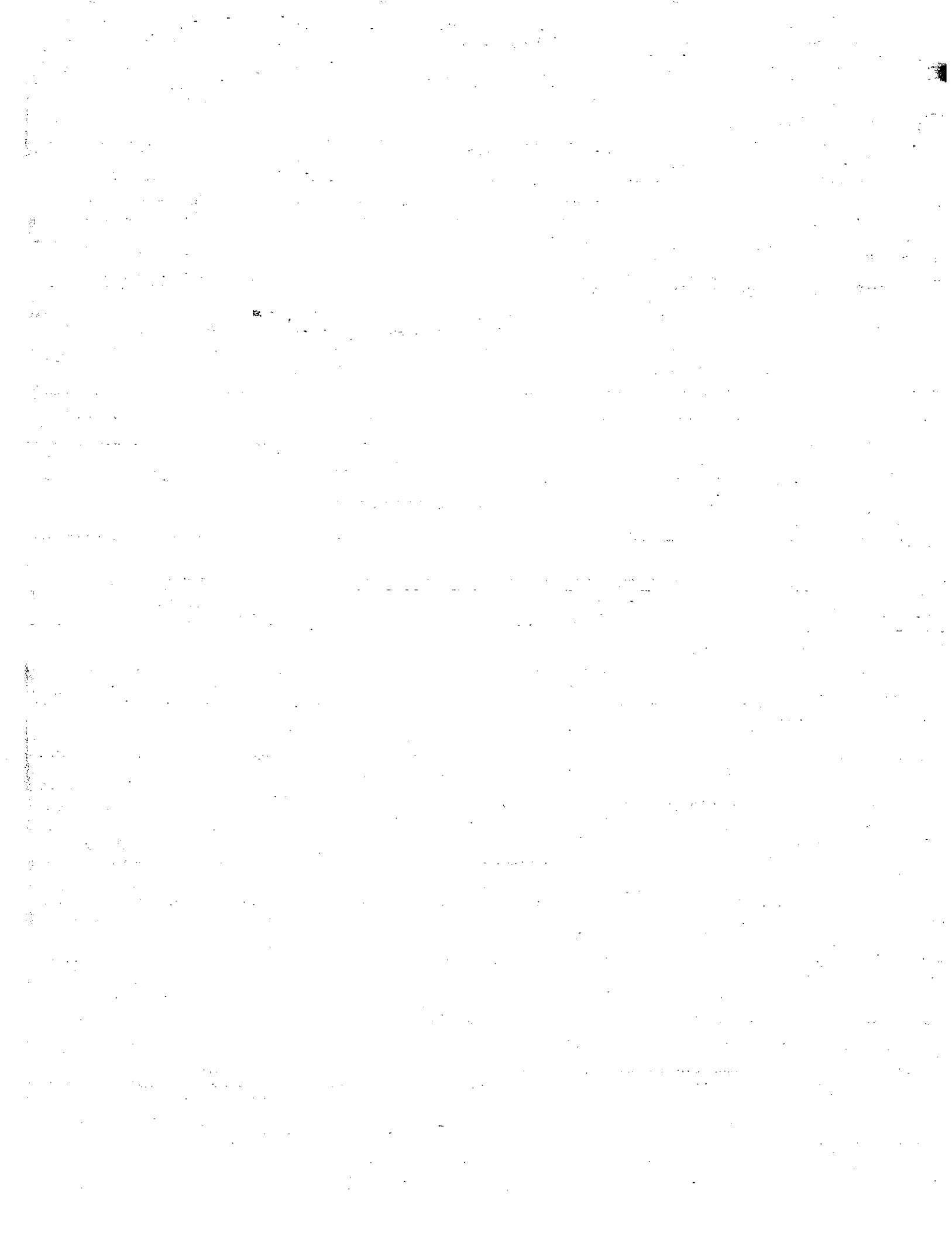
APPENDIX A-1		Y/N
D. Were the ground water surface elevations evaluated to determine whether the monitoring wells are properly placed? 3745-65-93(F)		NA
E. If it was determined that modification of the number, location or depth of monitoring wells was necessary, was the system brought into compliance with 3745-65-91(A)? 3745-65-93(F)		NA
11. Has an outline of a ground water quality assessment program been prepared? 3745-65-93(A)		Y
A. Does it describe a program capable of determining:		
1) Whether hazardous waste or hazardous waste constituents have entered the ground water? 3745-65-93(A)(1)		Y
2) The rate and extent of migration of hazardous waste or hazardous waste constituents? 3745-65-93(A)(2)		N *7
3) Concentrations of hazardous waste or hazardous waste constituents in ground water? 3745-65-93(A)(3)		Y
B. Have at least four replicate measurements of each indicator parameter been obtained for samples taken for each well? 3745-65-93(B)		NA
1) Were the results compared with the initial background mean?		NA
a) Was each well considered individually?		NA
b) Was the Student's t-test used (at the 0.01 level of significance)?		NA
2) Was a significant increase (or pH decrease) found in the:		
a) Upgradient wells?		NA
b) Downgradient wells?		NA
If "Yes," Compliance Checklist A-2 must also be completed.		
12. Have records been kept of analyses for parameters establishing ground water quality and indicators of ground water contamination? 3745-65-94(A)(1)		NA
13. Have records been kept of ground water surface elevations taken at the time of sampling for each well? 3745-65-94(A)(1)		NA
14. Have the following been submitted to the Director: 3745-65-94(A)(2).		
A. Initial background concentrations of parameters listed in 3745-65-92(B)(1) within 15 days after completing each quarterly analysis required during the first year? 3745-65-94(A)(2)(a)		NA
B. For each well, any parameters whose concentrations or values have exceeded the maximum contaminant levels allowed in drinking water supplies? 3745-65-94(A)(2)(a)		NA
C. Annual reports including: 3745-65-94(A)(2)(b)		
1) Concentrations or values of parameters used as indicators of ground water contamination for each well?		NA

Y = YES, N = NO, NA = NOT APPLICABLE  
 NS = NOT SPECIFIED, \* = COMMENT

APPENDIX A-1		Y/N
2) Separate identification of any significant differences from initial background found in upgradient wells? 3745-65-94(A)(2)(b)		NA
3) Results of the evaluation of ground water surface elevations?		NA
4) Was the Annual Report submitted by March 1 of the following year? 3745-65-75(F)		N

#### COMMENTS

1. See Violations.
2. Depths are unknown.
3. MW#1 has structural damage, see violations.
4. Insufficient hydrogeological information has been submitted.
5. Not mentioned in SAP.
6. This work has not been performed to the best of Ohio EPA's knowledge.
7. The outline does not mention how the rate will be determined.
8. No report or analytical results reported to Ohio EPA.





State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.  
Columbus, Ohio 43266-0149



CERTIFIED MAIL

January 10, 1989

OH D982218489  
Richland Co.  
(a.k.a. Trailer Master)

Richard F. Celeste  
Governor

POD=01/01/89

Mr. Frank Moritz  
President  
Moritz, Inc.  
400 Park Ave., East  
Mansfield, OH 44905

Dear Mr. Moritz:

Enclosed is the final report for the Comprehensive Ground Water Monitoring Evaluation (CME) conducted at the Moritz, Incorporated, facility in Mansfield, Ohio, on November 17, 1988. The CME was conducted to determine the facility's compliance with state and federal interim status standards for owners and operators of hazardous waste treatment, storage, and disposal facilities; specifically rules 3745-65-90 through 3745-65-94 of the Ohio Administrative Code (OAC) and Title 40, Part 265, Subpart F of the Code of Federal Regulations (40 CFR Part 265). The above noted regulations pertain to ground water monitoring. The CME was performed by Kathy Little and Rod Miller of the Northwest District Office.

The CME report consists of several sections including background information and data on site history and operations, various RCRA checklists and comments developed from the completion of said checklists. A review of the CME revealed that Moritz, Inc. is in violation of rules 3745-65-90 through 3745-65-94 of the Ohio Administrative Code because the facility does not have a groundwater monitoring system at the present time.

Violations of this nature are considered very serious by both Ohio EPA and USEPA and may warrant a formal enforcement action.

Please submit documentation of compliance or plans for compliance with the above cited rules within 30 days to Ohio EPA's Northwest District Office with a copy of your response forwarded to this writer. If you have any questions, please contact me at (614)644-2944.

Sincerely,

Dave Sholtis, Supervisor  
Compliance/Inspections Unit  
RCRA Enforcement Section  
DSHWM

Reviewed by:

Michael A. Savage, Manager  
RCRA Enforcement Section  
DSHWM

NUPD

DS/MS/JM/drr

1945S/2



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.  
Columbus, Ohio 43266-0149

Richard F. Celeste  
Governor

December 21, 1988

Mr. Kevin Pierard, Chief  
Ohio-Minnesota Technical Enforcement Section  
Hazardous Waste Enforcement Branch 5HS-12  
US EPA, Region V  
230 South Dearborn Street  
Chicago, Illinois 60604

Dear Mr. Pierard:

Please find enclosed the final CME document for Moritz, Inc. This document is submitted as partial fulfillment of the 1989 RCRA grant commitments for first quarter.

The document was prepared by Kathy Little of the Division of Ground Water, Northwest District Office with assistance from Rod Miller of the Division of Solid and Hazardous Waste Management, Northwest District Office.

Should you have questions, please contact me at (614) 644-2905.

Sincerely,

Timothy P. Krichbaum, Manager  
Technical Services Section  
DIVISION OF GROUND WATER

TPK/rs  
TK004  
encl.

cc: Joel Morbito, US EPA- Region V.  
Paul Flanigan, Chief, OEPA-DSHWM.  
Linda Welch, OEPA-DSHWM.  
Mike Savage, OEPA-DSHWM.  
Dave Sholtis, OEPA-DSHWM (w/enc.)  
Tom Crepeau, OEPA-DSHWM (w/enc.)  
Gary Martin, Chief, OEPA-DGW.  
Tom Allen, OEPA-DGW.  
Jan Carlson, OEPA-DGW.  
Tim Fishbaugh, OEPA-NWDO. (w/enc.)  
Kathy Little, OEPA-NWDO.  
Chuck Hull, OEPA-NWDO. (w/enc.)  
Rod Miller, OEPA-NWDO.  
Lauren Alterman, AGO. (w/enc.)

RECEIVED  
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OFFICE OF RCRA  
Waste Management Division  
U.S. EPA, REGION V

COMPREHENSIVE GROUNDWATER MONITORING EVALUATION  
of  
MORITZ, INC.

MANSFIELD, OHIO

RICHLAND COUNTY

OHD \*\*\*\*\*

OHIO ENVIRONMENTAL PROTECTION AGENCY

DECEMBER 21, 1988

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## I. GENERAL INFORMATION

### A. Purpose

A CME (Comprehensive Monitoring Evaluation) is an in-depth evaluation of the adequacy of the design and operation of a RCRA facility's groundwater monitoring system with respect to 40 CFR , Part 265, Subpart F. The evaluation consists of a detailed review of relevant groundwater documents and files followed by a site inspection. This report is then prepared that presents, in narrative form, a summary of the evaluation including site inspection checklists.

### B. Information Sources

Information sources used were Division of Solid and Hazardous Waste files; published regional geologic, glacial, and hydrogeologic maps and documents; and, results of a site inspection conducted on November 17, 1988. A site investigation has never been conducted, therefore, no site-specific hydrogeologic information is available to date.

The following documents and maps were used in this evaluation:

Pree, Henry L., 1962, Underground Water Resources, Black and Clear Fork Basins, map.

Redmond, Charles E., et.al., 1975, Soil Survey of Richland County, Ohio, USDA, Soil Conservation Service, 132 p.

Schmidt, James J., 1979, Groundwater Resources of Richland County, map.

Totten, Stanley M., 1973, Glacial Geology of Richland County, Ohio Dept. of Natural Resources, Report of Investigations No. 88, 55 p.

Totten, Stanley M., 1973, Glacial Geology of Richland County, map.

Ohio Department of Natural Resources well logs, Sections 21 and 22, Madison Township, Richland County, Ohio.

Division of Solid and Hazardous Waste files, Ohio Environmental Protection Agency, Northwest District Office.

## II. SITE HISTORY AND OPERATIONS

### A. Facility Name

Moritz, Inc.

### B. EPA I.D. Number

Non-notifier [The generator of waste (not Moritz, Inc.) has notified but Moritz, Inc. has not notified as the "land disposal unit".]

### C. Facility Location

Moritz, Inc. is located on the eastern edge of Mansfield, Section 22, Mansfield Township, Richland County, Ohio at 400 Park Avenue East. Richland County is located in central Ohio approximately 65 miles northeast of Columbus and 79 miles southeast of Cleveland. The location of the facility is shown in Figure 1. Moritz, Inc. is in a mostly industrial area with other companies nearby.

### D. Facility Description

Moritz, Inc. is a livestock trailer fabrication facility which employs approximately 66 people (1986). The company was established in 1964. After the trailers are constructed they are hand cleaned with solvent soaked rags before painting. The trailers are then painted and during this process solvents are used to thin the paints and clean the spray guns and other equipment. Three basic solvents are used which include xylene, toluene, and aromatic petroleum distillates.

Moritz, Inc. stated, during an Interim Status Standards Inspection (October 27, 1988), that the cleaning and painting of trailers is done by another company subcontracted by Moritz, Inc. At the time of a Special Investigations Unit investigation (May 7, 1987), a company different from the current company painted the trailers.

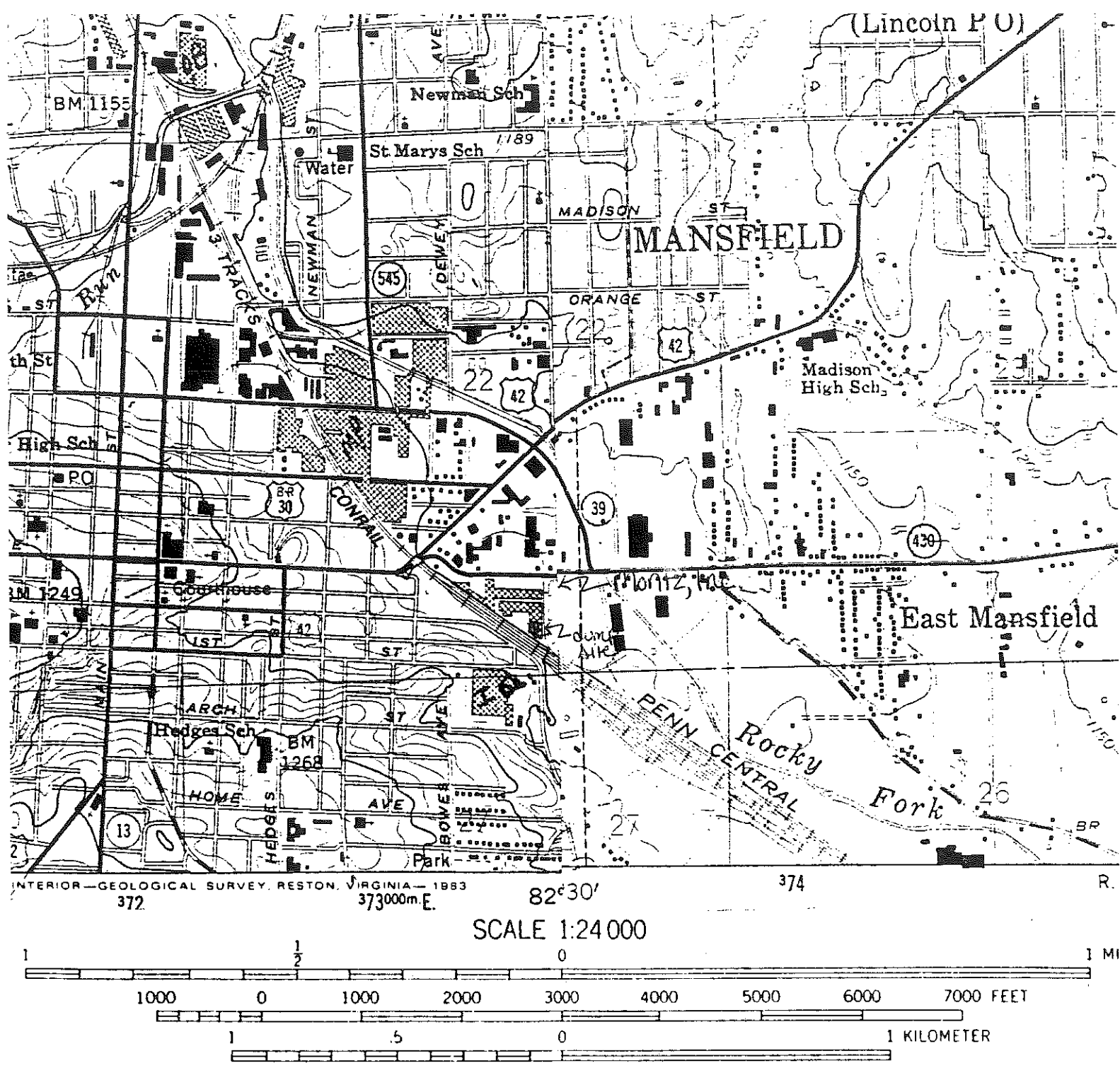
### E. Waste Materials Handled

The following wastes are handled at the facility:

1. F003 xylene
2. F005 toluene
3. D001 aromatic petroleum distillates

There may also be heavy metal wastes generated from the paint.

The solvent and ignitable wastes are generated from cleaning the trailers, spray guns, and equipment. Some of these materials may be reused in the paint.



CONTOUR INTERVAL 10 FEET  
 DATUM IS MEAN SEA LEVEL

zone 17, shown in blue

Red tint indicates areas in which only landmark building

**MANSFIELD NORTH, OHIO** Entire area lies within Congress Lands north of the old

Figure 1

## **F. Regulatory History and Disposal Practices**

A Special Investigation Unit (SIU) investigation which included a site visit and waste and soil sampling occurred on May 7, 1987. The results of this investigation revealed soil contamination and were relayed to Moritz, Inc. by letter on May 22, 1987, February 9, 1988 and February 26, 1988. 7-7, Inc., the consultant for Moritz, Inc., sent initial information to Ohio EPA on April 15, 1988 and June 30, 1988 concerning sampling and closure/cleanup. In a letter dated August 30, 1988, Ohio EPA formally requested a closure plan from Moritz, Inc.

It is alleged that the facility placed paint wastes, waste solvents and other unknown materials into and onto the ground, dumpsters and other unknown locations at the facility. Results of the sample analyses taken during the investigation indicated soil contamination from xylene, toluene, naptha, mineral spirits and lead. The known disposal area has dimensions of approximately 100 by 125 feet (Figure 1).

An Interim Status Standards inspection was conducted at Moritz, Inc. on November 9, 1988 for treatment, storage, and disposal requirements by the Ohio EPA. Twelve violations were cited. During this inspection it appeared that the current company generating hazardous waste from painting trailers was manifesting it off-site to a TSD.

## **III. REGIONAL GEOLOGY**

No site hydrogeologic study has been conducted to date. Therefore, only regional geologic information is available.

### **A. Site Characteristics**

The city of Mansfield, approximately 600 feet east-northeast of the site, is located on the Allegheny Plateau province and has a gently sloping topography towards Rocky Fork. Topographic elevations in the vicinity of the site range from approximately 1150 to 1160 amsl. Regional information indicates that the site is underlain by glacial deposits overlying sandstone and shale bedrock.

### **B. Soils**

The site is located on an area classified as Urban Land. Urban Land describes areas covered mostly by buildings or pavement and where the original soil has been disturbed. Surrounding the Urban land area is the Lobdell silt loam to the east, northwest, and south. The Lobdell series consists of nearly level, moderately well-drained soils formed in alluvial sediments, and are subject to occasional flooding. Lobdell silt loam is located on higher parts of flood plains in valleys, and is very variable in texture.

**C. Glacial Geology**

The site is located on glacial outwash deposits on the edge of the Rocky Fork Valley. The glacial outwash consists of valley trains and low terraces resulting from damming of the northward flowing Rocky Fork by glaciers. Meltwater then deposited sand and gravel, partially filling the preglacial valley. Postglacial erosion left terraces along the valley walls.

Sand and gravel is present in six out of twelve local ODNR well logs and was encountered eight to 81 feet in depth.

Adjacent to the southwest side of the site is the Hayesville till which is a massive, compact, dark grey till containing nearly equal amounts of silt and clay with some pebbles. Weathered Hayesville till occurs at seven to ten feet in depth and often has horizontal partings.

**D. Bedrock**

The bedrock underneath the site consists of the Black Hand Member of the Mississippian Cuyahoga Formation. The Black Hand Member is a resistant, coarse-grained, lens shaped sandstone which overlies the Pleasant Valley Member, also of the Cuyahoga Formation. To the east along the Rocky Fork stream valley, the uppermost formation is the Black Hand Member, which consists of thin-bedded grey siltstones and shales.

According to local ODNR well logs, depth to top of sandstone varies from 3 to 73 feet, and depth to top of shale varies from 98 to 107 feet.

**E. Surface Water**

Rocky Fork drains south to the Mohican River which drains to the Ohio River. Most of the surface drainage is probably controlled by city sewer systems and drainage sumps in parking lots and along roads.

**IV. REGIONAL HYDROGEOLOGY**

Sand and gravel deposits within the buried valley underneath and surrounding Rocky Fork can yield more than 200 to 500 gpm at 120 to 275 feet depth. Sandstones and shales of the Cuyahoga Group can readily yield 5 to 20 gpm and more than 250 gpm at around 350 feet depth.

The City of Mansfield has public water supply wells in sand and gravel at 100 to 120 feet, located in Section 26, one to two miles to the southeast. Non-located ODNR well logs of Sections 21 and 22 show private wells installed both in sandstone and shale and overlying sands and gravels, where present. In all the well logs the depth to water varies from 30 to 87 feet.

The Rocky Fork is most likely hydraulically connected to the regional aquifer system, especially the sand and gravel. Because No hydrogeologic work has been initiated to date, local direction of groundwater flow is not documented.

#### **V. GROUNDWATER MONITORING SYSTEM**

Moritz, Inc. does not have any monitoring wells on-site and, to date, has not proposed a groundwater monitoring system.

#### **VI. GROUNDWATER SAMPLING AND ANALYSIS**

A sampling and analysis plan has not been submitted to date.

#### **VII. COMPLIANCE STATUS**

Paint waste and waste solvents were disposed onto and into the site grounds and dumpsters. Analysis of on-site soil samples revealed the presence of xylene, toluene, naptha, mineral spirits, and lead.

According to 40 CFR 265, Subpart F, Moritz, Inc. is required to monitor the groundwater quality in the waste disposal area, which served as a land disposal unit. The facility does not have a groundwater monitoring system in place and operational at the present time. Therefore, Moritz, Inc. is in violation of all applicable sections of 40 CFR 265, Subpart F and OAC 3745-65-90 through 3745-65-94.

# APPENDIX A-1

## FACILITY INSPECTION FORM FOR COMPLIANCE WITH INTERIM STATUS STANDARDS COVERING GROUND-WATER MONITORING

Company Name: Moritz, Inc. ; EPA LD. Number: Non-notifier

Company Address: 400 Park Ave., East ; Inspector's Name: Kathy Little  
Mansfield, OH 44905

Company Contact/Official: Frank Moritz ; Branch/Organization: \_\_\_\_\_

Title: President ; Date of Inspection: 11-17-88

Type of facility: (check appropriately)	<u>Yes</u>	<u>No</u>	<u>Unknown</u>
a) surface impoundment	_____	<u>X</u>	_____
b) landfill	<u>X</u>	_____	_____
c) land treatment facility	_____	<u>X</u>	_____
d) storage facility	_____	<u>X</u>	_____

### Ground-Water Monitoring Plan

1. Has a ground-water monitoring plan been submitted to the Regional Administrator for facilities containing a surface impoundment, landfill, land treatment process, or storage facility?

\_\_\_\_\_

2. Was the ground-water monitoring plan reviewed prior to site visit?  
If "No",

\_\_\_\_\_

a) Was the ground-water plan reviewed at the facility prior to actual site inspection?  
If "No", explain.

\_\_\_\_\_

NOTE: A groundwater monitoring system does not exist at the site, therefore, this checklist does not apply.



## APPENDIX A

# COMPREHENSIVE GROUND-WATER MONITORING EVALUATION WORKSHEET

The following worksheets have been designed to assist the enforcement officer/technical reviewer in evaluating the ground-water monitoring system an owner/operator uses to collect and analyze samples of ground water. The focus of the worksheets is technical adequacy as it relates to obtaining and analyzing representative samples of ground water. The basis of the worksheets is the final RCRA Ground Water Monitoring Technical Enforcement Guidance Document which describes in detail the aspects of ground-water monitoring which EPA deems essential to meet the goals of RCRA. Appendix A is not a regulatory checklist. Specific technical deficiencies in the monitoring system can, however, be related to the regulations as illustrated in Figure 4.3 taken from the RCRA Ground-Water Monitoring Compliance Order Guide (COG) (included at the end of the appendix). The enforcement officer, in developing an enforcement order, should relate the technical assessment from the worksheets to the regulations using Figure 4.3 from the COG as a guide.

Comprehensive Ground-Water Monitoring Evaluation	Y/N
<b>I. Office Evaluation Technical Evaluation of the Design of the Ground-Water Monitoring System</b>	
<b>A. Review of Relevant Documents</b>	
1. What documents were obtained prior to conducting the inspection:	
a. RCRA Part A permit application?	N
b. RCRA Part B permit application?	N
c. Correspondence between the owner/operator and appropriate agencies or citizen's groups?	Y
d. Previously conducted facility inspection reports?	Y
e. Facility's contractor reports?	N
f. Regional hydrogeologic, geologic, or soil reports?	Y
g. The facility's Sampling and Analysis Plan?	N
h. Ground-water Assessment Program Outline (or Plan, if the facility is in assessment monitoring)?	N
i. Other (specify) _____	Y

	Y/N
<b>B. Evaluation of the Owner/Operator's Hydrogeologic Assessment</b>	
1. Did the owner/operator use the following direct techniques in the hydrogeologic assessment:	
a. Logs of the soil borings/rock corings (documented by a professional geologist, soil scientist, or geotechnical engineer)?	N
b. Materials tests (e.g., grain size analyses, standard penetration tests, etc.)?	N
c. Piezometer installation for water level measurements at different depths? d. Slug tests?	N
e. Pump tests?	N
f. Geochemical analyses of soil samples?	N
g. Other (specify) (e.g., hydrochemical diagrams and wash analysis)	N
2. Did the owner/operator use the following indirect technique to supplement direct techniques data:	
a. Geophysical well logs?	N
b. Tracer studies?	N
c. Resistivity and/or electromagnetic conductance?	N
d. Seismic Survey?	N
e. Hydraulic conductivity measurements of cores?	N
f. Aerial photography?	N
g. Ground penetrating radar?	N
h. Other (specify)	N
3. Did the owner/operator document and present the raw data from the site hydrogeologic assessment?	N
4. Did the owner/operator document methods (criteria) used to correlate and analyze the information?	N
5. The owner/operator prepare the following:	
a. Narrative description of geology?	N
b. Geologic cross sections?	N
c. Geologic and soil maps?	N
d. Boring/coring logs?	N
e. Structure contour maps of the differing water bearing zones and confining layer?	N
f. Narrative description and calculation of ground-water flows?	N

	Y/N
g. Water table/potentiometric map?	N
h. Hydrologic cross sections?	N
6. Did the owner/operator obtain a regional map of the area and delineate the facility?	N
If yes, does this map illustrate:	
a. Surficial geology features?	
b. Streams, rivers, lakes, or wetlands near the facility?	
c. Discharging or recharging wells near the facility?	
7. Did the owner/operator obtain a regional hydrogeologic map?	N
If yes, does this hydrogeologic map indicate:	
a. Major areas of recharge/discharge?	
b. Regional ground-water flow direction?	
c. Potentiometric contours which are consistent with observed water level elevations?	
8. Did the owner/operator prepare a facility site map?	N
If yes, does the site map show:	
a. Regulated units of the facility (e.g., landfill areas, impoundments)?	
b. Any seeps, springs, streams, ponds, or wetlands?	
c. Location of monitoring wells, soil borings, or test pits?	
d. How many regulated units does the facility have? _____	
If more than one regulated unit then,	
• Does the waste management area encompass all regulated units?	
• Is a waste management area delineated for each regulated unit?	
<b>C. Characterization of Subsurface Geology of Site</b>	
1. Soil boring/test pit program:	
a. Were the soil borings/test pits performed under the supervision of a qualified professional?	N/A
b. Did the owner/operator provide documentation for selecting the spacing for borings?	N/A
c. Were the borings drilled to the depth of the first confining unit below the uppermost zone of saturation or ten feet into bedrock?	N/A
d. Indicate the method(s) of drilling:	N/A

	Y/N
Auger (hollow or solid stem) _____	
Mud rotary _____	
Reverse rotary _____	
Cable tool _____	
Jetting _____	
Other (specify) <u>N/A</u>	
e. Were continuous sample corings taken?	N/A
f. How were the samples obtained (checked method[s])	
• Split spoon _____	
• Shelby tube, or similar _____	
• Rock coring _____	
• Ditch sampling _____	
• Other (explain) <u>N/A</u>	
g. Were the continuous sample corings logged by a qualified professional in geology?	N/A
h. Does the field boring log include the following information:	
• Hole name/number?	N/A
• Date started and finished?	N/A
• Driller's name?	N/A
• Hole location (i.e., map and elevation)?	N/A
• Drill rig type and bit/auger size?	N/A
• Gross petrography (e.g., rock type) of each geologic unit?	N/A
• Gross mineralogy of each geologic unit?	N/A
• Gross structural interpretation of each geologic unit and structural features (e.g., fractures, gouge material, solution channels, buried streams or valleys, identification of depositional material)?	N/A
• Development of soil zones and vertical extent and description of soil type?	N/A
• Depth of water bearing unit(s) and vertical extent of each?	N/A
• Depth and reason for termination of borehole?	N/A
• Depth and location of any contaminant encountered in borehole?	N/A
• Sample location/number?	N/A
• Percent sample recovery?	N/A
• Narrative descriptions of:	
—Geologic observations?	N/A
—Drilling observations?	N/A
i. Were the following analytical tests performed on the core samples:	
• Mineralogy (e.g., microscopic tests and x-ray diffraction)?	N/A
• Petrographic analysis:	
—degree of crystallinity and cementation of matrix?	N/A
—degree of sorting, size fraction (i.e., sieving), textural variations?	N/A
—rock type(s)?	N/A

	Y/N
—soil type?	N/A
—approximate bulk geochemistry?	N/A
—existence of microstructures that may effect or indicate fluid flow?	N/A
• Falling head tests?	N/A
• Static head tests?	N/A
• Settling measurements?	N/A
• Centrifuge tests?	N/A
• Column drawings?	N/A
<b>D. Verification of Subsurface Geological Data</b>	
1. Has the owner/operator used indirect geophysical methods to supplement geological conditions between borehole locations?	N/A
2. Do the number of borings and analytical data indicate that the confining layer displays a low enough permeability to impede the migration of contaminants to any stratigraphically low water-bearing units?	N/A
3. Is the confining layer laterally continuous across the entire site?	N/A
4. Did the owner/operator consider the chemical compatibility of the site-specific waste types and the geologic materials of the confining layer?	N/A
5. Did the geologic assessment address or provide means for resolution of any information gaps of geologic data?	N/A
6. Do the laboratory data corroborate the field data for petrography?	N/A
7. Do the laboratory data corroborate the field data for mineralogy and subsurface geochemistry?	N/A
<b>E. Presentation of Geologic Data</b>	
1. Did the owner/operator present geologic cross sections of the site?	N
2. Do cross sections:	
a. identify the types and characteristics of the geologic materials present?	N/A
b. define the contact zones between different geologic materials?	N/A
c. note the zones of high permeability or fracture?	N/A
d. give detailed borehole information including:	

	Y/N
• location of borehole?	N/A
• depth of termination?	N/A
• location of screen (if applicable)?	N/A
• depth of zone(s) of saturation?	N/A
• backfill procedure?	N/A
3. Did the owner/operator provide a topographic map which was constructed by a licensed surveyor?	N
4. Does the topographic map provide:	
a. contours at a maximum interval of two-feet?	N/A
b. locations and illustrations of man-made features (e.g., parking lots, factory buildings, drainage ditches, storm drain, pipelines, etc.)?	N/A
c. descriptions of nearby water bodies?	N/A
d. descriptions of off-site wells?	N/A
e. site boundaries?	N/A
f. individual RCRA units?	N/A
g. delineation of the waste management area(s)?	N/A
h. well and boring locations?	N/A
5. Did the owner/operator provide an aerial photograph depicting the site and adjacent off-site features?	N
6. Does the photograph clearly show surface water bodies, adjacent municipalities, and residences and are these clearly labelled?	N/A
<b>F. Identification of Ground-Water Flowpaths</b>	
1. Ground-water flow direction	
a. Was the well casing height measured by a licensed surveyor to the nearest 0.01 feet?	N/A
b. Were the well water level measurements taken within a 24 hour period?	N/A
c. Were the well water level measurements taken to the nearest 0.01 feet?	N/A
d. Were the well water levels allowed to stabilize after construction and development for a minimum of 24 hours prior to measurements?	N/A
e. Was the water level information obtained from (check appropriate one):	N/A
• multiple piezometers placed in single borehole? _____	
• vertically nested piezometers in closely spaced separate _____	
• boreholes? _____	
• monitoring wells? _____	

	Y/N
f. Did the owner/operator provide construction details for the piezometers?	N/A
g. How were the static water levels measured (check method[s]).	
• Electric water sounder _____	
• Wetted tape _____	
• Air line _____	
• Other (explain) _____	N/A
h. Was the well water level measured in wells with equivalent screened intervals at an equivalent depth below the saturated zone?	N/A
i. Has the owner/operator provided a site water table (potentiometric) contour map?	N/A
If yes,	
• Do the potentiometric contours appear logical and accurate based on topography and presented data? (Consult water level data)	
• Are ground-water flow-lines indicated?	
• Are static water levels shown?	
• Can hydraulic gradients be estimated?	
j. Did the owner/operator develop hydrologic cross sections of the vertical flow component across the site using measurements from all wells?	N/A
k. Do the owner/operator's flow nets include:	
• piezometer locations?	N/A
• depth of screening?	N/A
• width of screening?	N/A
• measurements of water levels from all wells and piezometers?	N/A
2. Seasonal and temporal fluctuations in ground-water	
a. Do fluctuations in static water levels occur? If yes, are the fluctuations caused by any of the following:	N/A
—Off-site well pumping	N/A
—Tidal processes or other intermittent natural variations (e.g., river stage, etc.)	N/A
—On-site well pumping	N/A
—Off-site, on-site construction or changing land use patterns	N/A
—Deep well injection	N/A
—Seasonal variations	N/A
—Other (specify) _____	N/A
b. Has the owner/operator documented sources and patterns that contribute to or affect the ground-water patterns below the waste management?	N/A
c. Do water level fluctuations alter the general ground-water gradients and flow directions?	N/A
d. Based on water level data, do any head differentials occur that may indicate a vertical flow component in the saturated zone?	N/A

	Y/N
e. Did the owner/operator implement means for gauging long term effects on water movement that may result from on-site or off-site construction or changes in land-use patterns?	N/A
3. Hydraulic conductivity	
a. How were hydraulic conductivities of the subsurface materials determined?	N/A
• Single-well tests (slug tests)?	N/A
• Multiple-well tests (pump tests)	N/A
• Other (specify) _____	N/A
b. If single-well tests were conducted, was it done by:	
• Adding or removing a known volume of water?	N/A
• Pressurizing well casing?	N/A
c. If single well tests were conducted in a highly permeable formation, were pressure transducers and high-speed recording equipment used to record the rapidly changing water levels?	N/A
d. Since single well tests only measure hydraulic conductivity in a limited area, were enough tests run to ensure a representative measure of conductivity in each hydrogeologic unit?	N/A
e. Is the owner/operator's slug test data (if applicable) consistent with existing geologic information (e.g., boring logs)?	N/A
f. Were other hydraulic conductivity properties determined?	N/A
g. If yes, provide any of the following data, if available:	
• Transmissivity _____	
• Storage coefficient _____	
• Leakage _____	
• Permeability _____	
• Porosity _____	
• Specific capacity _____	
• Other (specify) _____	N/A
4. Identification of the uppermost aquifer	
a. Has the extent of the uppermost saturated zone (aquifer) in the facility area been defined? If yes,	N
• Are soil boring/test pit logs included?	N
• Are geologic cross-sections included?	N
b. Is there evidence of confining (competent, unfractured, continuous, and low permeability) layers beneath the site? If yes,	N/A
• how was continuity demonstrated? _____	N/A
c. What is hydraulic conductivity of the confining unit (if present)? CM/Sec How was it determined?	N/A

	Y/N
d. Does potential for other hydraulic communication exist (e.g., lateral discontinuity between geologic units, facies changes, fracture zones, cross cutting structures, or chemical corrosion/alteration of geologic units by leachage? If yes or no, what is the rationale? _____ _____ _____	N/A
<b>G. Office Evaluation of the Facility's Ground-Water Monitoring System— Monitoring Well Design and Construction:</b>  These questions should be answered for each different well design present at the facility.  <b>1. Drilling Methods</b> a. What drilling method was used for the well? • Hollow-stem auger <input type="checkbox"/> • Solid-stem auger <input type="checkbox"/> • Mud rotary <input type="checkbox"/> • Air rotary <input type="checkbox"/> • Reverse rotary <input type="checkbox"/> • Cable tool <input type="checkbox"/> • Jetting <input type="checkbox"/> • Air drill w/ casing hammer <input type="checkbox"/> • Other (specify) _____	N/A
b. Were any cutting fluids (including water) or additives used during drilling? If yes, specify: • Type of drilling fluid _____ • Source of water used _____ • Foam _____ • Polymers _____ • Other _____	N/A
c. Was the cutting fluid, or additive, identified?	N/A
d. Was the drilling equipment steam-cleaned prior to drilling the well? • Other methods _____	N/A
e. Was compressed air used during drilling? If yes, • was the air filtered to remove oil?	N/A
f. Did the owner/operator document procedure for establishing the potentiometric surface? If yes, • how was the location established?	N/A
g. Formation samples	N/A

	<b>Y/N</b>
• Were formation samples collected initially during drilling?	N/A
• Were any cores taken continuous?	N/A
• If not, at what interval were samples taken?	N/A
• How were the samples obtained? —Split spoon —Shelby tube —Core drill —Other (specify)	N/A
• Identify if any physical and/or chemical tests were performed on the formation samples (specify) _____ _____ _____	N/A
<b>2. Monitoring Well Construction Materials</b>	
a. Identify construction materials (by number) and diameters (ID/OD)	
	<u>Material</u> <u>Diameter</u>
• Primary Casing	_____
• Secondary or outside casing (double construction)	_____
• Screen	_____
b. How are the sections of casing and screen connected?	N/A
• Pipe sections threaded	N/A
• Couplings (friction) with adhesive or solvent	N/A
• Couplings (friction) with retainer screws	N/A
• Other (specify)	N/A
c. Were the materials steam-cleaned prior to installation?	N/A
• If no, how were the materials cleaned? _____	N/A
<b>3. Well Intake Design and Well Development</b>	
a. Was a well intake screen installed?	N/A
• What is the length of the screen for the well? _____	N/A
• Is the screen manufactured?	N/A
b. Was a filter pack installed?	N/A
• What kind of filter pack was employed? _____	N/A
• Is the filter pack compatible with formation materials?	N/A
• How was the filter pack installed? _____	N/A

	Y/N
• What are the dimensions of the filter pack? _____	N/A
• Has a turbidity measurement of the well water ever been made?	N/A
• Have the filter pack and screen been designed for the insitu materials? _____	N/A
c. Well development	
• Was the well developed?	N/A
• What technique was used for well development? —Surge block —Bailer —Air surging —Water pumping —Other (specify) _____	N/A
4. Annular Space Seals	
a. What is the annular space in the saturated zone directly above the filter pack filled with: —Sodium bentonite (specify type and grit) —Cement (specify neat or concrete) —Other (specify) _____	N/A
b. Was the seal installed by: —Dropping material down the hole and tamping —Dropping material down the inside of hollow-stem auger —Tremie pipe method —Other (specify) _____	N/A
c. Was a different seal used in the unsaturated zone? If yes,	N/A
• Was this seal made with? —Sodium bentonite (specify type and grit) —Cement (specify neat or concrete)- Other (specify) _____	N/A
• Was this seal installed by? —Dropping material down the hole and tamping —Dropping material down the inside of hollow stem auger —Other (specify) _____	N/A
d. Is the upper portion of the borehole sealed with a concrete cap to prevent infiltration from the surface?	N/A
e. Is the well fitted with an above-ground protective device and bumper guards?	N/A
f. Has the protective cover been installed with locks to prevent tampering?	N/A

	Y/N
<b>H. Evaluation of the Facility's Detection Monitoring Program</b>	
1. Placement of Downgradient Detection Monitoring Wells	
a. Are the ground-water monitoring wells or clusters located immediately adjacent to the waste management area?	N/A
b. How far apart are the detection monitoring wells?	N/A
c. Does the owner/operator provide a rationale for the location of each monitoring well or cluster?	N/A
d. Does the owner/operator identified the well screen lengths of each monitoring well or clusters?	N/A
e. Does the owner/operator provide an explanation for the well screen lengths of each monitoring well or cluster?	N/A
f. Do the actual locations of monitoring wells or clusters correspond to those identified by the owner/operator?	N/A
2. Placement of Upgradient Monitoring Wells	
a. Has the owner/operator documented the location of each upgradient monitoring well or cluster?	N/A
b. Does the owner/operator provide an explanation for the location(s) of the upgradient monitoring wells?	N/A
c. What length screen has the owner/operator employed in the background monitoring well(s)?	N/A
d. Does the owner/operator provide an explanation for the screen length(s) chosen?	N/A
e. Does the actual location of each background monitoring well or cluster correspond to that identified by the owner/operator?	N/A
<b>I. Office Evaluation of the Facility's Assessment Monitoring Program</b>	
1. Does the assessment plan specify:	
a. The number, location, and depth of wells?	N/A
b. The rationale for their placement and identify the basis that will be used to select subsequent sampling locations and depths in later assessment phases?	N/A
2. Does the list of monitoring parameters include all hazardous waste constituents from the facility?	N/A

	Y/N
a. Does the water quality parameter list include other important indicators not classified as hazardous waste constituents?	N/A
b. Does the owner/operator provide documentation for the listed wastes which are not included?	N/A
3. Does the owner/operator's assessment plan specify the procedures to be used to determine the rate of constituent migration in the ground-water?	N/A
4. Has the owner/operator specified a schedule of implementation in the assessment plan?	N/A
5. Have the assessment monitoring objectives been clearly defined in the assessment plan?	N/A
a. Does the plan include analysis and/or re-evaluation to determine if significant contamination has occurred in any of the detection monitoring wells?	N/A
b. Does the plan provide for a comprehensive program of investigation to fully characterize the rate and extent of contaminant migration from the facility?	N/A
c. Does the plan call for determining the concentrations of hazardous wastes and hazardous waste constituents in the ground water?	N/A
d. Does the plan employ a quarterly monitoring program?	N/A
6. Does the assessment plan identify the investigatory methods that will be used in the assessment phase?	N/A
a. Is the role of each method in the evaluation fully described?	N/A
b. Does the plan provide sufficient descriptions of the direct methods to be used?	N/A
c. Does the plan provide sufficient descriptions of the indirect methods to be used?	N/A
d. Will the method contribute to the further characterization of the contaminant movement?	N/A
7. Are the investigatory techniques utilized in the assessment program based on direct methods?	N/A
a. Does the assessment approach incorporate indirect methods to further support direct methods?	N/A
b. Will the planned methods called for in the assessment approach ultimately meet performance standards for assessment monitoring?	N/A
c. Are the procedures well defined?	N/A
d. Does the approach provide for monitoring wells similar in design and construction as the detection monitoring wells?	N/A

	Y/N
e. Does the approach employ taking samples during drilling or collecting core samples for further analysis?	N/A
8. Are the indirect methods to be used based on reliable and accepted geophysical techniques?	N/A
a. Are they capable of detecting subsurface changes resulting from contaminant migration at the site?	N/A
b. Is the measurement at an appropriate level of sensitivity to detect ground-water quality changes at the site?	N/A
c. Is the method appropriate considering the nature of the subsurface materials?	N/A
d. Does the approach consider the limitations of these methods?	N/A
e. Will the extent of contamination and constituent concentration be based on direct methods and sound engineering judgment? (Using indirect methods to further substantiate the findings.)	N/A
9. Does the assessment approach incorporate any mathematical modeling to predict contaminant movement?	N/A
a. Will site specific measurements be utilized to accurately portray the subsurface?	N/A
b. Will the derived data be reliable?	N/A
c. Have the assumptions been identified?	N/A
d. Have the physical and chemical properties of the site-specific wastes and hazardous waste constituents been identified?	N/A
<b>J. Conclusions</b>	
<b>1. Subsurface geology</b>	
a. Has sufficient data been collected to adequately define petrography and petrographic variation?	N
b. Has the subsurface geochemistry been adequately defined?	N
c. Was the boring/coring program adequate to define subsurface geologic variation?	N
d. Was the owner/operator's narrative description complete and accurate in its interpretation of the data?	N
e. Does the geologic assessment address or provide means to resolve any information gaps?	N
<b>2. Ground-water flowpaths</b>	
a. Did the owner/operator adequately establish the horizontal and vertical components of ground-water flow?	N

	Y/N
b. Were appropriate methods used to establish ground-water flowpaths?	N/A
c. Did the owner/operator provide accurate documentation?	N/A
d. Are the potentiometric surface measurements valid?	N/A
e. Did the owner/operator adequately consider the seasonal and temporal effects on the ground-water?	N/A
f. Were sufficient hydraulic conductivity tests performed to document lateral and vertical variation in hydraulic conductivity in the entire hydrogeologic subsurface below the site?	N/A
3. Uppermost Aquifer	
a. Did the owner/operator adequately define the upper-most aquifer?	N
4. Monitoring Well Construction and Design	
a. Do the design and construction of the owner/operator's ground-water monitoring wells permit depth discrete ground-water samples to be taken?	N/A
b. Are the samples representative of ground-water quality?	N/A
c. Are the ground-water monitoring wells structurally stable?	N/A
d. Does the ground-water monitoring well's design and construction permit an accurate assessment of aquifer characteristics?	N/A
5. Detection Monitoring	
a. Downgradient Wells <ul style="list-style-type: none"> <li>Do the location, and screen lengths of the ground-water monitoring wells or clusters in the detection monitoring system allow the immediate detection of a release of hazardous waste or constituents from the hazardous waste management area to the uppermost aquifer?</li> </ul>	N
b. Upgradient Wells <ul style="list-style-type: none"> <li>Do the location and screen lengths of the upgradient (background) ground-water monitoring wells ensure the capability of collecting ground-water samples representative of upgradient (background) ground-water quality including any ambient heterogeneous chemical characteristics?</li> </ul>	N
6. Assessment Monitoring	
a. Has the owner/operator adequately characterized site hydrogeology to determine contaminant migration?	N
b. Is the detection monitoring system adequately designed and constructed to immediately detect any contaminant release?	N

	Y/N
c. Are the procedures used to make a first determination of contamination adequate?	N
d. Is the assessment plan adequate to detect, characterize, and track contaminant migration?	N
e. Will the assessment monitoring wells, given site hydrogeologic conditions, define the extent and concentration of contamination in the horizontal and vertical planes?	N
f. Are the assessment monitoring wells adequately designed and constructed?	N
g. Are the sampling and analysis procedures adequate to provide true measures of contamination?	N
h. Do the procedures used for evaluation of assessment monitoring data result in determinations of the rate of migration, extent of migration, and hazardous constituent composition of the contaminant plume?	N
i. Are the data collected at sufficient frequency and duration to adequately determine the rate of migration?	N
j. Is the schedule of implementation adequate?	N
k. Is the owner/operator's assessment monitoring plan adequate?	N
• If the owner/operator had to implement his assessment monitoring plan, was it implemented satisfactorily?	N
<b>II. Field Evaluation</b>	
<b>A. Ground-Water Monitoring System</b>	
1. Are the numbers, depths, and locations of monitoring wells in agreement with those reported in the facility's monitoring plan? (See Section 3.2.3.)	N/A
<b>B. Monitoring Well Construction</b>	
1. Identify construction material material diameter	
a. Primary Casing _____	
b. Secondary or outside casing _____	N/A
2. Is the upper portion of the borehole sealed with concrete to prevent infiltration from the surface?	N/A
3. Is the well fitted with an above-ground protective device?	N/A
4. Is the protective cover fitted with locks to prevent tampering? If a facility utilizes more than a single well design, answer the above questions for each well design?	N/A

	Y/N
<b>III. Review of Sample Collection Procedures</b>	
<b>A. Measurement of Well Depths /Elevation</b>	
1. Are measurements of both depth to standing water and depth to the bottom of the well made?	N/A
2. Are measurements taken to the 0.01 feet?	N/A
3. What device is used?	N/A
4. Is there a reference point established by a licensed surveyor?	N/A
5. Is the measuring equipment properly cleaned between well locations to prevent cross contamination?	N/A
<b>B. Detection of Immiscible Layers</b>	
1. Are procedures used which will detect light phase immiscible layers?	N/A
2. Are procedures used which will detect heavy phase immiscible layers?	N/A
<b>C. Sampling of Immiscible Layers</b>	
1. Are the immiscible layers sampled separately prior to well evacuation?	N/A
2. Do the procedures used minimize mixing with watersoluble phases?	N/A
<b>D. Well Evacuation</b>	
1. Are low yielding wells evacuated to dryness?	N/A
2. Are high yielding wells evacuated so that at least three casing volumes are removed?	N/A
3. What device is used to evacuate the wells?	N/A
4. If any problems are encountered (e.g., equipment malfunction) are they noted in a field logbook?	N/A

	Y/N
<b>E. Sample Withdrawal</b>	
1. For low yielding wells, are samples for volatiles, pH, and oxidation/reduction potential drawn first after the well recovers?	N/A
2. Are samples withdrawn with either fluoro carbon/resins or stainless steel (316, 304 or 2205) sampling devices?	N/A
3. Are sampling devices either bottom valve bailers or positive gas displacement bladder pumps?	N/A
4. If bailers are used, is fluorocarbon/resin coated wire, single strand stainless steel wire, or monofilament used to raise and lower the bailer?	N/A
5. If bladder pumps are used, are they operated in a continuous manner to prevent aeration of the sample?	N/A
6. If bailers are used, are they lowered slowly to prevent degassing of the water?	N/A
7. If bailers are used, are the contents transferred to the sample container in a way that minimizes agitation and aeration?	N/A
8. Is care taken to avoid placing clean sampling equipment on the ground or other contaminated surfaces prior to insertion into the well?	N/A
9. If dedicated sampling equipment is not used, is equipment disassembled and thoroughly cleaned between samples?	N/A
10. If samples are for inorganic analysis, does the cleaning procedure include the following sequential steps: a. Dilute acid rinse ( $\text{HNO}_3$ or $\text{HCl}$ )?	N/A
11. If samples are for organic analysis, does the cleaning procedure include the following sequential steps:	
a. Nonphosphate detergent wash?	N/A
b. Tap water rinse?	N/A
c. Distilled/deionized water rinse?	N/A
d. Acetone rinse?	N/A
e. Pesticide-grade hexane rinse?	N/A

	<b>Y/N</b>
12. Is sampling equipment thoroughly dry before use?	N/A
13. Are equipment blanks taken to ensure that sample cross-contamination has not occurred?	N/A
14. If volatile samples are taken with a positive gas displacement bladder pump, are pumping rates below 100 ml/min?	N/A
<b>F. In-situ or Field Analyses</b>	
1. Are the following labile (chemically unstable) parameters determined in the field:	
a. pH?	N/A
b. Temperature?	N/A
c. Specific conductivity?	N/A
d. Redox potential?	N/A
e. Chlorine?	N/A
f. Dissolved oxygen?	N/A
g. Turbidity?	N/A
h. Other (specify) _____	N/A
2. For in-situ determinations, are they made after well evacuation and sample removal?	N/A
3. If sample is withdrawn from the well, is parameter measured from a split portion?	N/A
4. Is monitoring equipment calibrated according to manufacturers' specifications and consistent with SW-846?	N/A
5. Is the date, procedure, and maintenance for equipment calibration documented in the field logbook?	N/A
<b>IV. Review of Sample Preservation and Handling Procedures</b>	
<b>A. Sample Containers</b>	
1. Are samples transferred from the sampling device directly to their compatible containers?	N/A

	Y/N
2. Are sample containers for metals (inorganics) analyses polyethylene with polypropylene caps?	N/A
3. Are sample containers for organics analysis glass bottles with fluorocarbonresin-lined caps?	N/A
4. If glass bottles are used for metals samples are the caps fluorocarbonresin-lined?	N/A
5. Are the sample containers for metal analyses cleaned using these sequential steps:	
a. Nonphosphate detergent wash?	N/A
b. 1:1 nitric acid rinse?	N/A
c. Tap water rinse?	N/A
d. 1:1 hydrochloric acid rinse?	N/A
e. Tap water rinse?	N/A
f. Distilled/deionized water rinse?	N/A
6. Are the sample containers for organic analyses cleaned using these sequential steps:	
a. Nonphosphate detergent/hot water wash?	N/A
b. Tap water rinse?	N/A
c. Distilled/deionized water rinse?	N/A
d. Acetone rinse?	N/A
e. Pesticide-grade hexane rinse?	N/A
7. Are trip blanks used for each sample container type to verify cleanliness?	N/A
<b>B. Sample Preservation Procedures</b>	
1. Are samples for the following analyses cooled to 4°C:	
a. TOC?	N/A
b. TOX?	N/A
c. Chloride?	N/A
d. Phenols?	N/A
e. Sulfate?	N/A
f. Nitrate?	N/A
g. Coliform bacteria?	N/A
h. Cyanide?	N/A
i. Oil and grease?	N/A
j. Hazardous constituents (J261, Appendix VIII)?	N/A

	Y/N
2. Are samples for the following analyses field acidified to pH <2 with HNO <sub>3</sub> :	
a. Iron?	N/A
b. Manganese?	N/A
c. Sodium?	N/A
d. Total metals?	N/A
e. Dissolved metals?	N/A
f. Fluoride?	N/A
g. Endrin?	N/A
h. Lindane?	N/A
i. Methoxychlor?	N/A
j. Toxaphene?	N/A
k. 2,4, D?	N/A
l. 2,4,5 TP Silvex?	N/A
m. Radium?	N/A
n. Gross alpha?	N/A
o. Gross beta?	N/A
3. Are samples for the following analyses field acidified to pH <2 with H <sub>2</sub> SO <sub>4</sub> :	
a. Phenols?	N/A
b. Oil and grease?	N/A
4. Is the sample for TOC analyses field acidified to pH <2 with HCl?	N/A
5. Is the sample for TOX analysis preserved with 1 ml of 1.1 M sodium sulfite?	N/A
6. Is the sample for cyanide analysis preserved with NaOH to pH >12?	N/A
<b>C. Special Handling Considerations</b>	
1. Are organic samples handled without filtering?	N/A
2. Are samples for volatile organics transferred to the appropriate vials to eliminate headspace over the sample?	N/A
3. Are samples for metal analysis split into two portions?	N/A
4. Is the sample for dissolved metals filtered through a 0.45 micron filter?	N/A
5. Is the second portion not filtered and analyzed for total metals?	N/A
6. Is one equipment blank prepared each day of ground-water sampling?	N/A

	Y/N
<b>V. Review of Chain-of-Custody Procedures</b>	
<b>A. Sample Labels</b>	
1. Are sample labels used?	N/A
2. Do they provide the following information:	
a. Sample identification number?	N/A
b. Name of collector?	N/A
c. Date and time of collection?	N/A
d. Place of collection?	N/A
e. Parameter(s) requested and preservatives used?	N/A
3. Do they remain legible even if wet?	N/A
<b>B. Sample Seals</b>	
1. Are sample seals placed on those containers to ensure samples are not altered?	N/A
<b>C. Field Logbook</b>	
1. Is a field logbook maintained?	N/A
2. Does it document the following:	
a. Purpose of sampling (e.g., detection or assesment)?	N/A
b. Location of well(s)?	N/A
c. Total depth of each well?	N/A
d. Static water level depth and measurement technique?	N/A
e. Presence of immiscible layers and detection method?	N/A
f. Collection method for immiscible layers and sample identification numbers?	N/A
g. Well evacuation procedures?	N/A
h. Sample withdrawal procedure?	N/A
i. Date and time of collection?	N/A
j. Well sampling sequence?	N/A
k. Types of sample containers and sample identification number(s)?	N/A
l. Preservative(s) used?	N/A
m. Parameters requested?	N/A
n. Field analysis data and method(s)?	N/A
o. Sample distribution and transporter?	N/A
p. Field observations?	N/A

	<b>Y/N</b>
—Unusual well recharge rates?	N/A
—Equipment malfunction(s)?	N/A
—Possible sample contamination?	N/A
—Sampling rate?	N/A
<b>D. Chain-of-Custody Record</b>	
1. Is a chain-of-custody record included with each sample?	N/A
2. Does it document the following:	
a. Sample number?	N/A
b. Signature of collector?	N/A
c. Date and time of collection?	N/A
d. Sample type?	N/A
e. Station location?	N/A
f. Number of containers?	N/A
g. Parameters requested?	N/A
h. Signatures of persons involved in chain-of-custody?	N/A
i. Inclusive dates of custody?	N/A
<b>E. Sample Analysis Request Sheet</b>	
1. Does a sample analysis request sheet accompany each sample?	N/A
2. Does the request sheet document the following:	
a. Name of person receiving the sample?	N/A
b. Date of sample receipt?	N/A
c. Duplicates?	N/A
d. Analysis to be performed?	N/A
<b>IV. Review of Quality Assurance/Quality Control</b>	
<b>A. Is the validity and reliability of the laboratory and field generated data ensured by a QA/QC program?</b>	N
<b>B. Does the QA/QC program include:</b>	
1. Documentation of any deviation from approved procedures?	N

	Y/N
2. Documentation of analytical results for:	
a. Blanks?	N
b. Standards?	N
c. Duplicates?	N
d. Spiked samples?	N
e. Detectable limits for each parameter being analyzed?	N
C. Are approved statistical methods used?	N
D. Are QC samples used to correct data?	N
E. Are all data critically examined to ensure it has been properly calculated and reported?	N
<b>VII. Surficial Well Inspection and Field Observation</b>	
A. Are the wells adequately maintained?	N/A
B. Are the monitoring wells protected and secure?	N/A
C. Do the wells have surveyed casing elevations?	N/A
D. Are the ground-water samples turbid?	N/A
E. Have all physical characteristics of the site been noted in the inspector's field notes (i.e., surface waters, topography, surface features)?	N
F. Has a site sketch been prepared by the field inspector with scale, north arrow, location(s) of buildings, location(s) of regulated units, locations of monitoring wells, and a rough depiction of the site drainage pattern?	N

	Y/N
<b>VIII. Conclusions</b>	
A. Is the facility currently operating under the correct monitoring program according to the statistical analyses performed by the current operator?	N
B. Does the ground-water monitoring system, as designed and operated, allow for detection or assessment of any possible ground-water contamination caused by the facility?	N
C. Does the sampling and analysis procedures permit the owner/operator to detect and, where possible, assess the nature and extent of a release of hazardous constituents to ground water from the monitored hazardous waste management facility?	N

**Figure 4.3**  
**Relationship of Technical Inadequacies to**  
**Ground-Water Performance Standards**

Examples of Basic Elements Required by Performance Standards	Examples of Technical Inadequacies that may Constitute Violations	Regulatory Citations
1. Uppermost Aquifer must be correctly identified.	<ul style="list-style-type: none"> <li>• failure to consider aquifers hydraulically interconnected to the uppermost aquifer.</li> <li>• incorrect identification of certain formations as confining layers or aquitards.</li> <li>• failure to use test drilling and/or soil borings to characterize subsurface hydrogeology.</li> </ul>	<p>§265.90(a)  §265.91(a)(1, 2)  §270.14(c)(2)</p> <p>§265.90(a)  §265.91(a)(1, 2)  §270.14(c)(2)</p> <p>§265.90(a)  §265.91(a)(1, 2)  §270.14(c)(2)</p>
2. Ground-water flow directions and rates must be properly determined.	<ul style="list-style-type: none"> <li>• failure to use piezometers or wells to determine ground-water flow rates and directions (or failure to use a sufficient number of them).</li> <li>• failure to consider temporal variations in water levels when establishing flow directions (e.g., seasonal variations, short-term fluctuations due to pumping).</li> <li>• failure to assess significance of vertical gradients when evaluating flow rates and directions.</li> <li>• failure to use standard/consistent benchmarks when establishing water level elevations.</li> <li>• failure of the owner/operator (o/o) to consider the effect of local withdrawal wells on ground-water flow direction.</li> <li>• failure of the o/o to obtain sufficient water level measurements.</li> </ul>	<p>§265.90(a)  §265.91(a)(1, 2)  §270.14(c)(2)</p> <p>§265.90(a)  §265.91(a)(1, 2)  §270.14(c)(2)</p> <p>§265.90(a)  §265.91(a)(1, 2)  §270.14(c)(2)</p> <p>§265.90(a)  §265.91(a)(1, 2)  §270.14(c)(2)</p> <p>§265.90(a)  §265.91(a)(1)</p> <p>§265.90(a)  §265.91(a)(1)</p>

**A.4 Closure/  
Post-Closure**





State of Ohio Environmental Protection Agency

SET ADDRESS:

Lazarus Government Center  
122 S. Front Street  
Columbus, OH 43215-1099

TELE: (614) 644-3020 FAX: (614) 644-2329

MAILING ADDRESS:

P.O. Box 1049  
Columbus, OH 43216-1049

March 5, 2003

Re: **Tony Bandy Property**  
Completion of Full Closure  
Landfill Disposal Unit  
OHD 982 218 489

Tony Bandy Property  
Attn: Mr. Tony Bandy  
400 Park Avenue East  
Mansfield, Ohio 44905

Dear Mr. Bandy:

On October 3, 2002, the director of Ohio EPA approved the closure plan for the hazardous waste landfill disposal unit for the Tony Bandy Property (Tony Bandy) located at 400 Park Avenue East, Mansfield, Ohio 44905.

On November 22, 2002, the Director received certification documents from you and Mr. Gary E. Hoam, PE, of Chem-Tech Consultants, Inc., stating that the landfill disposal unit had been closed according to the specifications in the approved closure plan. Additional closure certification documentation was received by Ohio EPA on February 5, 2003. To verify Tony Bandy's closure activities, Mr. Eric Getz from Ohio EPA's Northwest District Office inspected the landfill disposal unit on November 27, 2002 and January 31, 2003. He also reviewed documents pertaining to the closure of this unit.

Based on this inspection and review, Ohio EPA has determined that Tony Bandy Property has closed the landfill disposal unit according to the approved closure plan and Rules 3745-66-11 through 3745-66-15 of the Ohio Administrative Code. The land disposal unit is no longer treating hazardous waste, and there are no other units at this facility that require closure.

Although Tony Bandy Property has satisfied its closure obligations under Ohio's hazardous waste laws for the landfill disposal unit, Tony Bandy is still required to investigate and possibly clean up contamination of hazardous waste or constituents at the facility, despite the time at which the waste was placed in the units. This obligation to investigate and possibly clean up contamination from past activities is also known as RCRA Corrective Action.

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MAR 11 2003

Technical Support and Permits Section  
Waste Management Branch  
Waste, Pesticides and Toxics Division  
U.S. EPA - Region 5

Bob Taft, Governor  
Maureen O'Connor, Lieutenant Governor  
Christopher Jones, Director



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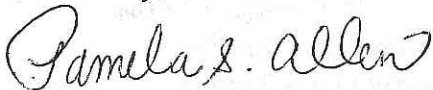
Mr. Tony Bandy  
Tony Bandy Property  
Page 2

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Since Tony Bandy is no longer a generator of hazardous waste, your facility's EPA I.D. number will need to be deactivated. To officially deactivate your facility I.D., please notify this office by letter. Send your correspondence to Tammy McConnell, Ohio EPA, Division of Hazardous Waste Management, 122 South Front Street, Columbus, Ohio 43215. Her phone number is (614) 644-2922.

If you have any questions concerning the closure process or the status of the facility, please contact Mr. Eric Getz by phone at (419) 373-3064. His mailing address is: Ohio EPA, Northwest District Office, 347 North Dunbridge Road, Bowling Green, Ohio 43402.

Sincerely,



Pamela S. Allen, Manager  
Regulatory and Information Services  
Division of Hazardous Waste Management

g:\users\lterry\Tony Bandy Final Closure

cc: Jeremy Carroll, ERAS, DHWM, CO  
John Schierberl, CAS, DHWM, CO  
Eric Getz, DHWM, NWDO  
Michael Terpinski, DHWM, NWDO  
Harriet Croke, USEPA, Region 5  
file



State of Ohio Environmental Protection Agency

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Northwest District Office

DIV. OF HAZARDOUS  
WASTE MGT

347 North Dunbridge Road  
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468

Bob Taft, Governor  
Christopher Jones, Director

## INTER-OFFICE COMMUNICATION

**TO:** Pam Allen, Data Management Section, DHWM, Central Office

**FROM:** Eric <sup>EG</sup> Getz, DHWM, NWDO

**SUBJECT:** Closure Certification for an unpermitted hazardous waste disposal unit:  
Tony Bandy Property (Moritz, Inc.)  
400 Park Ave. East  
Mansfield, Ohio 44905

**DATE:** February 18, 2003

---

On May 16, 1989, Moritz Inc. submitted to Ohio EPA a closure plan for the unpermitted hazardous waste disposal unit located at 400 Park Avenue East in Mansfield, Ohio. This closure plan was approved with modifications on April 26, 1991. On or about March 11, 1993, Tony Bandy purchased the Moritz property located at 400 Park Avenue East in Mansfield, Ohio and therefore became liable for completion of the closure of the hazardous waste landfill located at the facility.

The approved closure plan did not contain, in part, the following information; constituents of concern, clean levels, or an adequate sampling plan. Prior to the implementation of the closure plan, Ohio EPA required the owner to address these deficiencies. On September 26, 2000, Ohio EPA received a letter from Chem-Tech Consultants, Inc. which included additional information required by Ohio EPA to implement the previously approved closure plan.

On November 22, 2002, Ohio EPA received the closure plan certification document signed in accordance with OAC 3745-50-42 (D). Review of this document demonstrated that additional documentation was required to verify this unit had been properly closed. The certification lacked manifests demonstrating the amount of waste generated during the closure and how and where this waste was disposed, adequate maps of the sample locations, depth of samples, and analytical data demonstrating the excavated paint waste was evaluated prior to disposal. The consultant and Denver Roof, the site contact, were notified via telephone of these deficiencies.

A post closure inspection was conducted on November 27, 2002. The requested certification documentation was received at NWDO on December 12, 2002. This documentation demonstrated that the extent of contamination had not been adequately determined. Specifically, sample results from the soil sample from the location labeled as L-7 taken on May 8, 2001 from the "top 1" of soil exhibited a total lead concentration of 4,020 ppm. This sample was taken from the south side of the unit. No additional samples were taken farther south of this sample location. Therefore, additional sampling was required to determine the extent of contamination. Sample results from the additional sampling, submitted to this office on December 26, 2002, indicated that lead levels were found above the site specific clean level.



Therefore, additional excavation of contaminated soil was necessary. *It was noted that the resample of location L-7 was different, according to the hand drawn maps which were not to scale, than the location of the L-7 sample taken on May 8, 2001. The resample location corresponds to sample location L-7 from sampling performed on August 8, 2002 which appears to be 15 to 20 feet north of the initial location. The August 8, 2002 L-7 sample results indicated that this location had a lead concentration of 66.6 ppm after soil had been excavated from this area.*

An additional 12.65 tons of contaminated soil was removed from the unit. Additional samples were collected south, southwest and south east of L-7 on the southern border of this unit (property line). The sample obtained approximately 12 feet southeast of L-7 on the southern property line exhibits a total lead concentration of 1270 ppm. The site-specific clean level for lead is 916.8 ppm. A follow-up post closure inspection was conducted on January 31, 2003.

The additional closure certification documentation submitted to this office on February 4, 2003, indicates that any remaining levels of lead on the south side of this unit were caused by the nature of the fill material originally used (cinders, brick and other various media), the location of a railroad track and asphalt drive immediately south of this unit. It was also noted that there is evidence of elevated lead levels around this site.

The unpermitted hazardous waste disposal unit was created when painters working for Mortitz dumped spent paint wastes (spent solvent) out the back door of the painting area. The soil around this door was found to contain volatile constituents of concern. The extent of volatile constituents contamination was defined and the soil was removed and disposed. It was noted early on that determining the extent of lead contamination caused by the disposal of hazardous waste would be difficult because of the historical use of this site. This has turned out to be the case. However, it appears that the contamination associated with the unpermitted hazardous waste disposal unit has been remediated to a point protective of human health and the environment.

### **Environmental Measures**

As a result of closure activities, the following wastes were generated:

- 54.89 tons of F005 hazardous waste, this waste was disposed of at Michigan Disposal Waste Treatment in Belleville, Michigan.
- 137 cubic yards and 39.19 tons of solid waste, this waste was disposed of at Noble Road Landfill in Shiloh, Ohio.

Should you have any questions, please feel free to contact me at (419) 373-3055.

/llr

pc: Ed Lim, DHWM, CO  
Harry Sarvis, DHWM, CO  
Michael Terpinski, DHWM, NWDO  
DHWM-NWDO File



State of Ohio Environmental Protection Agency

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Corrective Action Section  
Waste Management Branch  
Waste, Pesticides and Toxics Division  
U.S. EPA - Region 5

OHIO E.P.A.  
OCT - 4 2002  
ENTERED DIRECTOR'S JOURNAL

Mr. Denver Roof  
400 Park Avenue East  
Mansfield, Ohio 44905

Re: Amended Closure Plan Approval  
400 Park Avenue East  
Tony Bandy Property  
OHD 982218489

Dear Mr. Roof:

On July 1, 2002, Tony Bandy submitted to Ohio EPA an amended closure plan for the unpermitted hazardous waste disposal unit located at 400 Park Avenue East in Mansfield, Ohio. The amended closure plan was submitted pursuant to rule 3745-66-12 of the Ohio Administrative Code (OAC) in order to demonstrate that Tony Bandy's proposal for amended closure complies with the requirements of OAC rules 3745-66-11 and 3745-66-12.

The owner or operator and the public were given the opportunity to submit written comments regarding the amended closure plan in accordance with the hazardous waste rule requirements. No public comments were received by Ohio EPA.

Based upon review of Tony Bandy's submittal, I conclude that the amended closure plan for the hazardous waste facility at 400 Park Avenue East, Mansfield, Ohio, as modified herein, meets the performance standard contained in OAC rule 3745-66-11 and complies with the pertinent parts of OAC rule 3745-66-12.

The amended closure plan submitted to Ohio EPA on July 1, 2002, by Tony Bandy is hereby approved with the following modification(s):

Page i, Exhibit H – Exhibit H, "Ground Water Risk Assessment Evaluation" is hereby renamed "Exhibit H Generic Risk-Based Cleanup Evaluation."

Page 14, Exhibits – Exhibit H is hereby renamed "Exhibit H Generic Risk-Based Cleanup Evaluation."

For the State of Ohio, true and accurate copy of the  
document as filed by the State of Ohio  
Environmental Protection Agency

By Maureen O'Connor Date 10/4/02

Bob Taft, Governor  
Maureen O'Connor, Lieutenant Governor  
Christopher Jones, Director

**Section 3.11, "Clean" Levels for Soil** – The section title "Clean" Levels for Soil is hereby renamed "Remediation Standards for Lead."

**Section 3.11, "Clean" Levels for Soil** – Toluene and Xylene are hereby stricken from the table in this section.

**Section 3.12, Risk-Based Remediation Standards** – The section titled "Risk-Based Remediation Standards" is hereby renamed "Risk-Based Remediation Standards for Toluene and Xylene" in both the Table of Contents and in the body of the closure plan.

**Section 3.12, Risk-Based Remediation Standards** – The contents of this section are hereby stricken and are replaced with the following text/table:

"Toluene and Xylene remediation standards were derived by utilizing Ohio EPA's Generic Risk-Based Cleanup Standards (GCNs) as stated in Ohio EPA's Closure Plan Review Guidance for RCRA Facilities, Part II, Appendix D, 1999 (CPRG). The Direct Contact for Soil GCNs were utilized to determine that no further remedial action is warranted at this site for these chemicals of concern. Please also see attached Ohio EPA Inter-Office Communication from Amber Hicks to Eric Getz, dated April 30, 2002 (Exhibit H)."

Direct Contact GCN for Soil (mg/kg)	Site Soil Concentration (mg/kg)	Parameter
576	4.2	Toluene
316	20.1	Xylene

"Xylene and Toluene both only have a Direct Contact Soil GCN listed for noncancer effects. Thus, only the hazard index will be calculated. Carcinogenic risk associated with this site was not calculated as no cancer effect GCNs have been established for either COC.

The total noncancer risk associated with xylene and toluene at the site may be represented by the following equation:

$$(\text{conc}_a / \text{GCN}_a) + (\text{conc}_b / \text{GCN}_b) + \dots + (\text{conc}_n / \text{GCN}_n) = \text{Hazard Index}$$

(Total Hazard Index must be 1 or less to be protective.)

$$(20.1_{\text{xylene}} / 316_{\text{xylene}}) + (4.2_{\text{toluene}} / 576_{\text{toluene}}) = \text{Hazard Index}$$

$$0.064 + 0.007 = 0.071$$

"The total Hazard Index equals 0.071 which is less than 1. Thus, these COCs are present at acceptable concentrations."

Compliance with the approved closure plan, especially including the modifications specified herein, is expected. Ohio EPA will monitor such compliance. Ohio EPA expressly reserves the right to take action, pursuant to chapters 3734. and 6111. of the Ohio Revised Code, and other applicable laws, to enforce such compliance and to seek appropriate remedies in the event of noncompliance with the provisions and modifications of this approved closure plan. Please be advised that approval of this amended closure plan does not release Tony Bandy from any responsibilities regarding corrective action for all releases of hazardous waste or constituents from any waste management unit, regardless of the time at which waste was placed in the unit.

You are hereby notified that this action of the Director of Environmental Protection is final and may be appealed to the Environmental Review Appeals Commission pursuant to Ohio Revised Code Section 3745.04. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the commission within 30 days after notice of the director's action. Notice of the filing of the appeal shall be filed with the director within three days after the appeal is filed with the commission. An appeal may be filed with the commission at the following address:

Environmental Review Appeals Commission  
236 East Town Street; Room 300  
Columbus, Ohio 43215

When closure is completed, OAC rule 3745-66-15 requires the owner or operator of a facility to submit to the director of Ohio EPA, certification by the owner or operator and an independent, registered professional engineer, that the facility has been closed in accordance with the approved closure plan. The certification by the owner or operator shall include the statement found in OAC rule 3745-50-42(D). These certifications should be submitted to: Pamela Allen, Information Technologies and Technical Support Section, Ohio EPA, Division of Hazardous Waste Management, P. O. Box 1049, Columbus, Ohio 43216-1049.

Mr. Denver Roof  
Page Four

Ohio EPA, Division of Hazardous Waste Management, strongly encourages you to consider pollution prevention options for any processes at your facility that generate waste. While implementation of pollution prevention options is not required by Ohio laws and regulations, the application of waste minimization practices may help reduce the expense of remedial activities. Additionally, implementation of pollution prevention options may prevent the creation of new units and, as a result, eliminate the requirement to submit a closure plan in the future. For assistance in identifying and implementing pollution prevention options, contact Colleen Weaver at (419)373-3059.

Sincerely,



Christopher Jones  
Director

/cs/

pc: Pamela Allen, ITTSS, DHWM, CO  
Ed Lim, Manager, Engineering & Risk Assessment Section, CO  
Harriet Croke, USEPA, Region V  
Eric Getz, DHWM, NWDO  
Michael Terpinski, DHWM, NWDO



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.  
Columbus, Ohio 43266-0149  
(614) 644-3020  
FAX (614) 644-2329

RECEIVED  
NOV 22 1994

OFFICE OF RCRA  
WASTE MANAGEMENT DIVISION  
EPA, REGION V

RECEIVED  
WMD RECORD CENTER

FEB 21 1995

George V. Voinovich  
Governor

CLOSURE PLAN EXTENSION DISAPPROVAL

CERTIFIED MAIL

Issuance Date November 17, 1994  
Effective Date December 19, 1994

RE: Closure Plan Extension  
Former Moritz Property  
400 Park Avenue East  
Richland County

November 17, 1994

Mr. Denver Roof, Owner  
400 Park Avenue East  
Mansfield, Ohio 44905

Dear Mr. Roof:

On May 16, 1989, Moritz Inc. submitted to the Ohio Environmental Protection Agency (Ohio EPA) a closure plan for a hazardous waste landfill located at 400 Park Avenue East in Mansfield, Ohio. This closure plan was approved with modifications on April 26, 1991. On or about March 13, 1993, Tony Bandy purchased the Moritz property located at 400 Park Avenue East in Mansfield, Ohio and therefore became liable for completion of the closure of the hazardous waste landfill located at the facility. In July of 1993, you became the owner of this property and are therefore responsible for completing closure of the hazardous waste landfill at the facility.

On September 21, 1993, you submitted a request for an extension to the closure period specified in the approved closure plan dated April 26, 1991 for 180 days. This extension request was not submitted pursuant to OAC 3745-66-13 (C) (2) as the extension request was not submitted to this office thirty days prior to expiration of the 180 day period. You were granted an extension for the closure which expired on March 19, 1994.

On April 8, 1994, you submitted a request for an extension to the closure period specified in the Closure Plan Extension letter dated November 4, 1993 for 180 days. As stated above, this closure period expired on March 19, 1994, therefore, this extension request was not submitted pursuant to OAC 3745-66-13 (C) (2) as the extension request was not submitted to this office thirty days prior to the expiration of the specified closure period.



100-100000-100000  
100-100000-100000  
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100-100000-100000  
100-100000-100000

A meeting was held at the Attorney General's Office in Columbus on May 16, 1994. This meeting was held to discuss the facility's failure to close the unpermitted land disposal unit and failure to evaluate the containerized waste stored on site in the time frames specified by the Ohio Environmental Protection Agency (EPA). Meeting attendees included; Denver Roof, owner; Don Lett, attorney; Lori Massey, Assistant Attorney General; Eric Getz, Ohio EPA; and Nyall McKenna, Ohio EPA. During this meeting, you stated that this additional extension to the closure period was needed to allow time for the building to be renovated and leased to generate the needed revenue to perform closure.

On June 27, 1994 you were granted an extension for the closure which expired on September 15, 1994.

On August 2, 1994 and August 24, 1994, the Ohio EPA attempted to contact you by telephone to assess the progress of the closure. On August 24, 1994 you responded by telephone and were informed that the closure was to have been completed by September 15, 1994. You stated that the building was still under renovation, therefore, no progress had been made on the closure of the hazardous waste unit.

A meeting was held at the site on September 6, 1994 to discuss the facility's pending failure to complete closure within the closure period which had been extended until September 15, 1994. Meeting attendees included Denver Roof, owner; Don Lett, attorney and Eric Getz, Ohio EPA. During this meeting you stated that you had lost track of time due to the ongoing renovation of the property and indicated you would be submitting a closure plan extension request within one to two weeks. You were advised to include detailed information in the closure plan extension request demonstrating the progress made in renovating and leasing the property.

On September 26, 1994, you submitted a request for an extension to the closure period specified in the Closure Plan Extension letter dated June 27, 1994 for 180 days until March 14, 1995. As stated above, this closure period expired on September 15, 1994, therefore, this extension request was not submitted pursuant to OAC 3745-66-13 (C) (2) as the extension request was not submitted to this office thirty days prior to the expiration of the specified closure period.

An extension of time allowed for closure is not granted for the following reasons: you have failed to make any progress on the closure of the hazardous waste unit; the extension requests for this closure have not been submitted within the required time frames pursuant to OAC 3745-66-13 (C) (2); you have failed to properly evaluate the containerized waste stored on-site, and the extension request received September 26, 1994 does not contain adequate information.

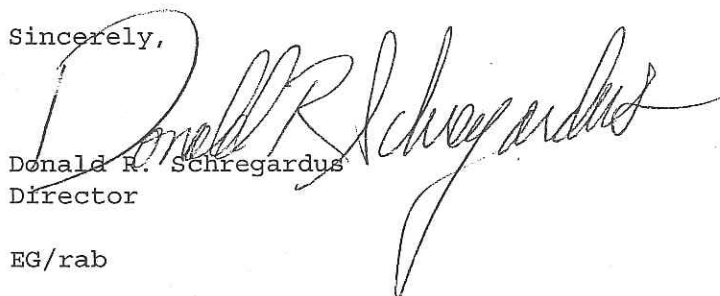


Please be advised that disapproval of this closure extension request does not release you from any responsibilities as required under the Hazardous and Solid Waste Amendments of 1984 regarding corrective action for all releases of hazardous waste or constituents from any solid waste management unit, regardless of the time at which waste was placed in the unit.

When closure is completed, the Ohio Administrative Code Rule 3745-66-15 requires the owner or operator of a facility to submit to the Director of the Ohio EPA certification by the owner or operator and an independent professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan. These certifications shall follow the format specified in OAC 3745-50-42 (D), and should be submitted to: Ohio Environmental Protection Agency, Division of Hazardous Waste Management, Attn: Tom Crepeau, Data Management Section, P.O. Box 163669, Columbus, Ohio 43226-3669.

You are notified that this action of the Director is issued as a proposed action pursuant to Section 3745.07. This action will become final on the effective date indicated unless you or an objector files an appeal requesting an adjudication hearing within (30) days of the date of issuance of this action. The adjudication hearing will be conducted in accordance with OAC Chapter 3745-47. The request for a hearing shall be sent to: Ohio Environmental Protection Agency, Hearing Clerk, 1800 WaterMark Drive, P.O. Box 1049, Columbus, Ohio 43266-0149.

Sincerely,



Donald R. Schregardus  
Director

EG/rab

pc: Tom Crepeau, DHWM Central File, Ohio EPA  
Lori A. Massey, Asst. Attorney General, CO  
Section Chief, Ohio Permit Section, USEPA - Region V  
Montee Suleiman, DHWM, CO  
Eric Getz, DHWM, NWDO





State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.  
Columbus, Ohio 43266-0149  
(614) 644-3020  
FAX (614) 644-2329

George V. Voinovich  
Governor

RE: CLOSURE PLAN EXTENSION  
Former Moritz Property  
400 Park Avenue East  
Richland County

June 27, 1994

CERTIFIED MAIL

Mr. Denver Roof, Owner  
400 Park Avenue East  
Mansfield, Ohio 44905

RECEIVED  
WMD RECORD CENTER

AUG 01 1994

Dear Mr. Roof:

On May 16, 1989, Moritz Inc. submitted to the Ohio Environmental Protection Agency (Ohio EPA) a closure plan for a hazardous waste landfill located at 400 Park Avenue East in Mansfield, Ohio. This closure plan was approved with modifications on April 26, 1991. On or about March 13, 1993, Tony Bandy purchased the Moritz property located at 400 Park Avenue East in Mansfield, Ohio and therefore became liable for completion of the closure of the hazardous waste landfill located at the facility. In July of 1993, you became the owner of this property and are therefore responsible for completing closure of the hazardous waste landfill at the facility.

On September 21, 1993, you submitted a request for an extension to the closure period specified in the approved closure plan dated April 26, 1991 for 180 days. This extension request was not submitted pursuant to OAC 3745-66-13 (C) (2) as the extension request was not submitted to this office thirty days prior to expiration of the 180 day period. You were granted an extension for the closure which expired on March 19, 1994.

On April 8, 1994, you submitted a second request for an extension to the closure period specified in the Closure Plan Extension letter dated November 4, 1993 for 180 days. As stated above, this closure period expired on March 19, 1994, therefore, this extension request was not submitted pursuant to OAC 3745-66-13 (C) (2) as the extension request was not submitted to this office thirty days prior to the expiration of the specified closure period.

A meeting was held at the Attorney General's Office in Columbus on May 16, 1994. This meeting was held to discuss the facility's failure to close the unpermitted land disposal unit and failure to evaluate the containerized waste stored on site in the time frames specified by the Ohio Environmental Protection Agency (EPA). Meeting attendees included; Denver Roof, owner; Don Lett, attorney; Lori Massey, Assistant Attorney General; Eric Getz, Ohio EPA; and Nyall McKenna, Ohio EPA. During this meeting, you stated that this additional extension to the closure period is needed to allow time for the building to be renovated and leased which will generate the needed revenue to perform closure.

I certify this to be a true and accurate copy of the  
official document as filed in the records of the Ohio  
Environmental Protection Agency.

By: Mary Carvin Date: 6-27-94

OHIO E.P.A.

JUN 27 94

ENTERED DIRECTOR'S JOURNAL

Mr. Roof  
Page Two

My staff reviewed your request and recommends that the extension be granted per rule 3745-66-13 (B) of the Ohio Administrative Code. I concur and am therefore granting this extension request. This extension is being granted for the above referenced closure plan and expires on September 15, 1994.

You shall continue to take all steps to prevent a threat to human health and the environment from the unclosed, but inactive waste management unit per OAC Rule 3745-66-13 (B) (2).

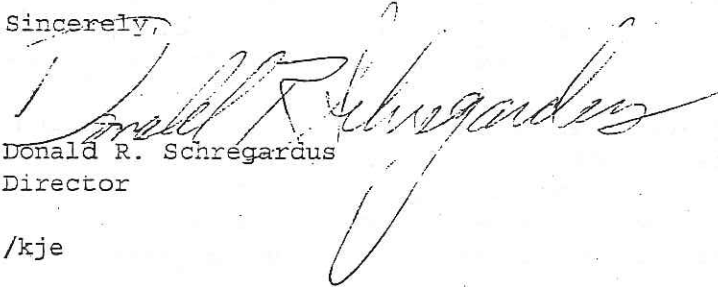
Please be advised that approval of this closure extension request does not release you from any responsibilities as required under the Hazardous and Solid Waste Amendments of 1984 regarding corrective action for all releases of hazardous waste or constituents from any solid waste management unit, regardless of the time at which waste was placed in the unit.

When closure is completed, the Ohio Administrative Code Rule 3745-66-15 requires the owner or operator of a facility to submit to the Director of the Ohio EPA certification by the owner or operator and an independent professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan. These certifications shall follow the format specified in OAC 3745-50-42 (D), and should be submitted to: Ohio Environmental Protection Agency, Division of Hazardous Waste Management, Attn: Tom Crepeau, Data Management Section, P.O. Box 1049, Columbus, Ohio 43226-1049.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Board of Review pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Board of Review within thirty (30) days from the receipt of this letter. A copy of the appeal must be served to the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Board. An appeal must be filed at the following address:

Environmental Board of Review  
236 East Town Street  
Room 300  
Columbus, Ohio 43215

Sincerely,

  
Donald R. Schregardus  
Director

/kje

pc: Tom Crepeau, DHWM Central File, Ohio EPA  
Section Chief, Ohio Permit Section, USEPA - Region V  
Eric Getz, DHWM, NWDO  
Nyall McKenna, DHWM, CO  
Closure Unit, CO

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

By: Mary Cavin Date 6-27-94

OHIO E.P.A.

JUN 27 94

ENTERED DIRECTOR'S JOURNAL



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.  
Columbus, Ohio 43266-0149  
(614) 644-3020  
FAX (614) 644-2329

RECEIVED DEC 01 1993  
WMD RCRA Paul A  
RECORD CENTER

George V. Voinovich  
Governor

RE: CLOSURE PLAN EXTENSION  
Former Moritz Property  
400 Park Avenue East  
Richland County

November 4, 1993

CERTIFIED MAIL

RECEIVED

NOV 12 1993

OFFICE OF RCRA  
WASTE MANAGEMENT DIV  
EPA REGION

Mr. Denver Roof, Owner  
400 Park Avenue East  
Mansfield, Ohio 44905

Dear Mr. Roof:

On May 16, 1989, Moritz Inc. submitted to the Ohio Environmental Protection Agency (Ohio EPA) a closure plan for a hazardous waste landfill located at 400 Park Avenue East in Mansfield, Ohio. This closure plan was approved with modifications on April 26, 1991. On or about March 13, 1993, Tony Bandy purchased the Moritz property located at 400 Park Avenue East in Mansfield, Ohio and therefore became liable for completion of the closure of the hazardous waste landfill located at the facility. In July of 1993 you became the owner of this property and you are therefore responsible for completing closure of the hazardous waste landfill at the facility.

On September 21, 1993, you submitted a request for an extension to the closure period specified in the approved closure plan dated April 26, 1991 for 180 days. The extension request was submitted pursuant to OAC Rule 3745-66-13 (B) as closure will require longer than the 180-day period specified in OAC Rule 3745-66-13. However, this extension request was not submitted pursuant to OAC 3745-66-13 (C)(2) as the extension request was not submitted to this office thirty days prior to expiration of the 180 day period. You stated you have requested this extension because of the recent purchase of the property from Tony Bandy.

My staff reviewed your request and recommends that the extension be granted per rule 3745-66-13 (B) of the Ohio Administrative Code. I concur and am therefore granting this extension request. This extension is being granted for the above referenced closure plan and expires on March 19, 1994.

You shall continue to take all steps to prevent a threat to human health and the environment from the unclosed, but inactive waste management unit per OAC Rule 3745-66-13 (B)(2).

I certify this to be a true and accurate copy of the  
official document as filed in the records of the Ohio  
Environmental Protection Agency.

By: Mary Cavin Date 11-4-93



Printed on recycled paper

OHIO EPA  
NOV -4 93  
FILED DIRECTOR'S JOURNAL

Mr. Denver Roof  
Page Two

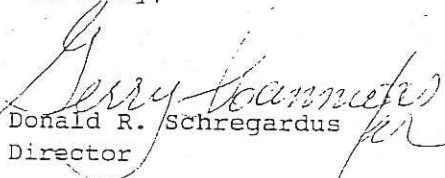
Please be advised that approval of this closure extension request does not release you from any responsibilities as required under the Hazardous and Solid Waste Amendments of 1984 regarding corrective action for all releases of hazardous waste or constituents from any solid waste management unit, regardless of the time at which waste was placed in the unit.

When closure is completed, the Ohio Administrative Code Rule 3745-66-15 requires the owner or operator of a facility to submit to the Director of the Ohio EPA certification by the owner or operator and an independent professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan. These certifications shall follow the format specified in OAC 3745-50-42 (D), and should be submitted to: Ohio Environmental Protection Agency, Division of Hazardous Waste Management, Attn: Tom Crepeau, Data Management Section, P.O. Box 1049, Columbus, Ohio 43226-1049.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Board of Review pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Board of Review within thirty (30) days from the receipt of this letter. A copy of the appeal must be served to the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Board. An appeal must be filed at the following address:

Environmental Board of Review  
236 East Town Street  
Room 300  
Columbus, Ohio 43215

Sincerely,

  
Donald R. Schregardus  
Director

EEG/rab

pc: Tom Crepeau, DHWM Central File, Ohio EPA  
Section Chief, Ohio Permit Section, USEPA - Region V  
Randy Meyer, DHWM, Ohio EPA  
Eric Getz, DHWM, NWDO  
Nyall McKenna, DHWM, CO

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

By: Mary Carvin Date 11-4-93

OHIO EPA.  
NOV -4 93  
INDEXED DIRECTOR'S JOURNAL



State of Ohio Environmental Protection Agency

Box 1049, 1800 WaterMark Dr.  
Columbus, Ohio 43266-0149  
(614) 644-3020  
FAX (614) 644-2329

George V. Voinovich  
Governor

## CLOSURE PLAN APPROVAL

### CERTIFIED MAIL

April 26, 1991

RE: CLOSURE PLAN  
Moritz, Inc.

OHD 982 218 489

RECEIVED  
APR 29 1991

Mr. Frank Moritz  
Moritz, Inc.  
400 Park Avenue, East  
Mansfield, Ohio 44905

File in  
Part A  
File

OFFICE OF RCRA  
Waste Management Division  
U.S. EPA, REGION V

Dear Mr. Moritz:

On May 16, 1989, Moritz, Inc. submitted to Ohio EPA a closure plan for a hazardous waste landfill located at 400 Park Avenue, East, Mansfield, Ohio. Revisions to the closure plan were received on November 8, 1990. The closure plan was submitted pursuant to Rule 3745-66-12 of the Ohio Administrative Code (OAC) in order to demonstrate that Moritz, Inc.'s proposal for closure complies with the requirements of OAC Rules 3745-66-11 and 3745-66-12.

The public was given the opportunity to submit written comments regarding the closure plan of Moritz, Inc. in accordance with OAC Rule 3745-66-12. No comments were received by Ohio EPA in this matter.

Based upon review of Moritz, Inc.'s submittal and subsequent revisions, I conclude that the closure plan for the hazardous waste facility at Moritz, Inc. as modified herein meets the performance standard contained in OAC Rule 3745-66-11 and complies with the pertinent parts of OAC Rule 3745-66-12.

The closure plan submitted to Ohio EPA by Moritz, Inc. is hereby approved with the following modifications:

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

By: Mary Cavin Date 4-26-91

OHIO E.P.A.

APR 26 91

ENTERED DIRECTOR'S JOURNAL



Mr. Frank Moritz  
Page Two

1. Page 3, Schedule for Closure.

The closure plan is hereby amended to include a statement indicating that Moritz, Inc. shall prepare and submit a ground water monitoring and sampling and analysis plan (in conformance with OAC 3745-65-90 through 94) to Ohio EPA, NWDO within 45 days of the receipt of this letter.

2. Page 5, Soil Sampling and Analytical Methods.

The soil sampling plan submitted by Cook Environmental Engineering on February 5, 1991 for Moritz, Inc., is hereby made a part of the approved closure plan. As illustrated on the sampling identification grid, twenty-five (25) soil sample borings shall be conducted in the locations shown and according to the closure plan's soil sampling and analytical methods.

3. Page 5, Soil Sampling and Analytical Methods.

The closure plan is hereby amended to state that all analytical results from sampling efforts shall be forwarded to Ohio EPA no more than five (5) working days following their receipt by the company.

4. Page 4, Decontamination Efforts.

The closure plan is hereby amended to include a decontamination area to be used for cleaning of equipment and vehicles which contact waste materials during closure. The area shall have a design similar to the one found in Attachment A of this letter and shall be able to contain all decontamination residues (solid and liquid) generated. The area shall also be large enough to accomodate the largest piece of equipment requiring decontamination.

5. Page 4, Decontamination Efforts.

Moritz, Inc. fails to establish proper clean levels for decontamination of equipment. Equipment shall be considered clean when concentrations of hazardous waste constituents fall below fifteen (15) times the maximum contaminant level (MCL) or maximum contaminant level goal

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

By: Mary Cannon Date 4-26-91

OHIO E.P.A.  
APR 26 91  
ENTERED DIRECTOR'S JOURNAL

Mr. Frank Moritz  
Page Three

(MCLG) up to a maximum of 1 mg/l. If the MCLG is zero, then the clean standard shall be fifteen (15) times the contaminant's analytical detection limit (using SW-846 methods) or 1 mg/l, whichever is less. If neither an MCL nor an MCLG exists for a particular contaminant, then 1 mg/l shall be the clean standard.

6. Pages 3-4, Personal Safety and Fire Prevention.

Moritz, Inc. shall submit a copy of the contractor's health and safety plan, within 45 days of the receipt of this letter. The health and safety plan shall contain, but not be limited to, the following items:

- a. A list of names, addresses and telephone numbers of key personnel and alternates responsible for site safety;
- b. Confirmation that personnel are adequately trained according to OSHA training standards listed in 29 CFR 1910.120;
- c. A description of the protective clothing and equipment, including respirators, to be worn by personnel during various operations and the standards which will be used to upgrade protection if needed; and
- d. A contingency plan for safe and effective response to emergencies.

7. Page 7, Certification.

The closure plan is hereby amended to state that the owner/operator's and the qualified, independent, registered, professional engineer's certifications of closure must follow the signature requirements found in OAC 3745-50-42. The owner/operator certification shall follow the exact wording found in OAC 3745-50-42(D).

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

By: Mary Conner Date 4-26-91

OHIO E.P.A.

APR 26 91

ENTERED DIRECTOR'S JOURNAL

Mr. Frank Moritz  
Page Four

Notwithstanding compliance with the terms of the closure plan, the Director may, on the basis of any information that there is or has been a release of hazardous waste, hazardous constituents, or hazardous substances into the environment, issue an order pursuant to Section 3734.20 et seq of the Revised Code or Chapters 3734 or 6111 of the Revised Code requiring corrective action or such other response as deemed necessary; or initiate appropriate action; or seek any appropriate legal or equitable remedies to abate pollution or contamination or to protect public health or safety or the environment.

Nothing here shall waive the right of the Director to take action beyond the terms of the closure plan pursuant to the Comprehensive Environmental Response, Compensation and Liability Act of 1980, 42 U.S.A. §9601 et seq., as amended by the Superfund Amendments and Reauthorization Act of 1986, Pub. L. 99-499 ("CERCLA") or to take any other action pursuant to applicable Federal or State law, including but not limited to the right to issue a permit with terms and conditions requiring corrective action pursuant to Chapters 3734 or 6111 of the Revised Code; the right to seek injunctive relief, monetary penalties and punitive damages, to undertake any removal, remedial, and/or response action relating to the facility, and to seek recovery for any costs incurred by the Director in undertaking such actions.

You are notified that this action of the director is final and may be appealed to the Environmental Board of Review pursuant to Section 3745.014 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Board of Review within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency and the Environmental Enforcement Section of the Office of the Attorney General within three (3) days of filing with the Board. An appeal may be filed with the Environmental Board of Review at the following address: Environmental Board of Review, 236 East Town Street, Room 300, Columbus, Ohio 43266-0557.

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

By: Mary Carlin Date 4-26-91

OHIO E.P.A.

APR 26 91

ENTERED DIRECTOR'S JOURNAL

Mr. Frank Moritz  
Page Five

When closure is completed, the Ohio Administrative Code Rule 3745-66-15 requires the owner or operator of a facility to submit to the Director of the Ohio EPA certification by the owner or operator and an independent, registered professional engineer that the facility has been closed in accordance with the approved closure plan. The certification by the owner or operator shall include the statement found in OAC 3745-50-42(D). These certifications should be submitted to: Ohio Environmental Protection Agency, Division of Solid and Hazardous Waste Management, Attn: Thomas Crepeau, Data Management Section, P.O. Box 1049, Columbus, Ohio 43266-0149.

Sincerely,



Gerry Ioannides  
Director

GI/PV/pas

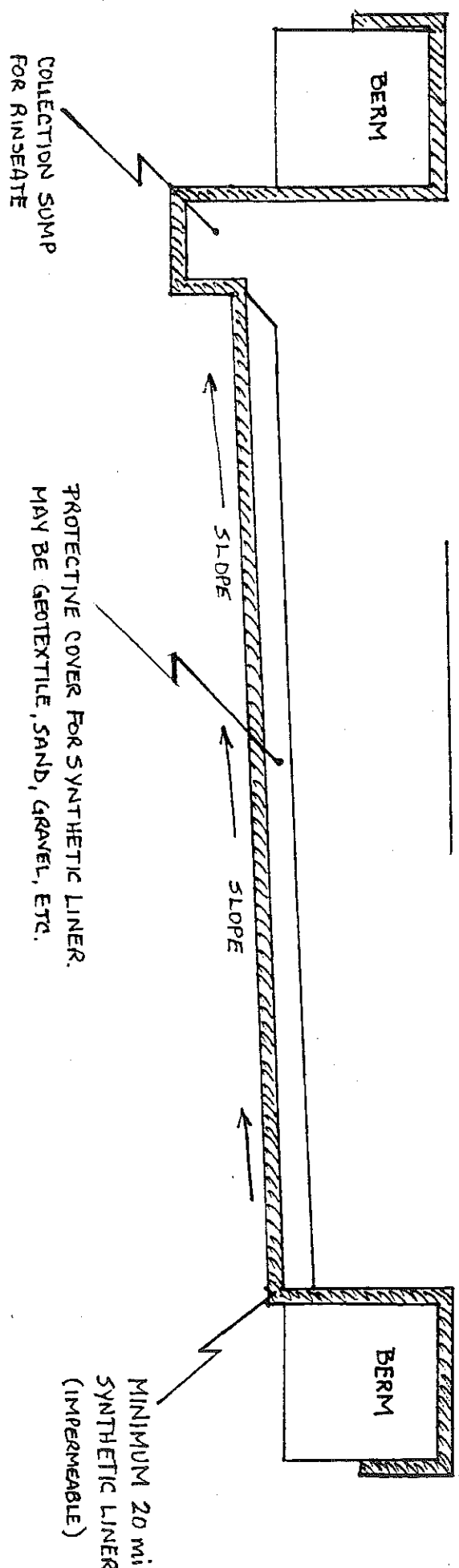
cc: Tom Crepeau, DSHWM Central File, Ohio EPA  
Paul Vandermeer, Ohio EPA, DSHWM  
Lisa Pierard, USEPA - Region V  
Joel Morbito, USEPA - Region V  
Philip Williams, NWDO, Ohio EPA  
Chris Korleski, AGO

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

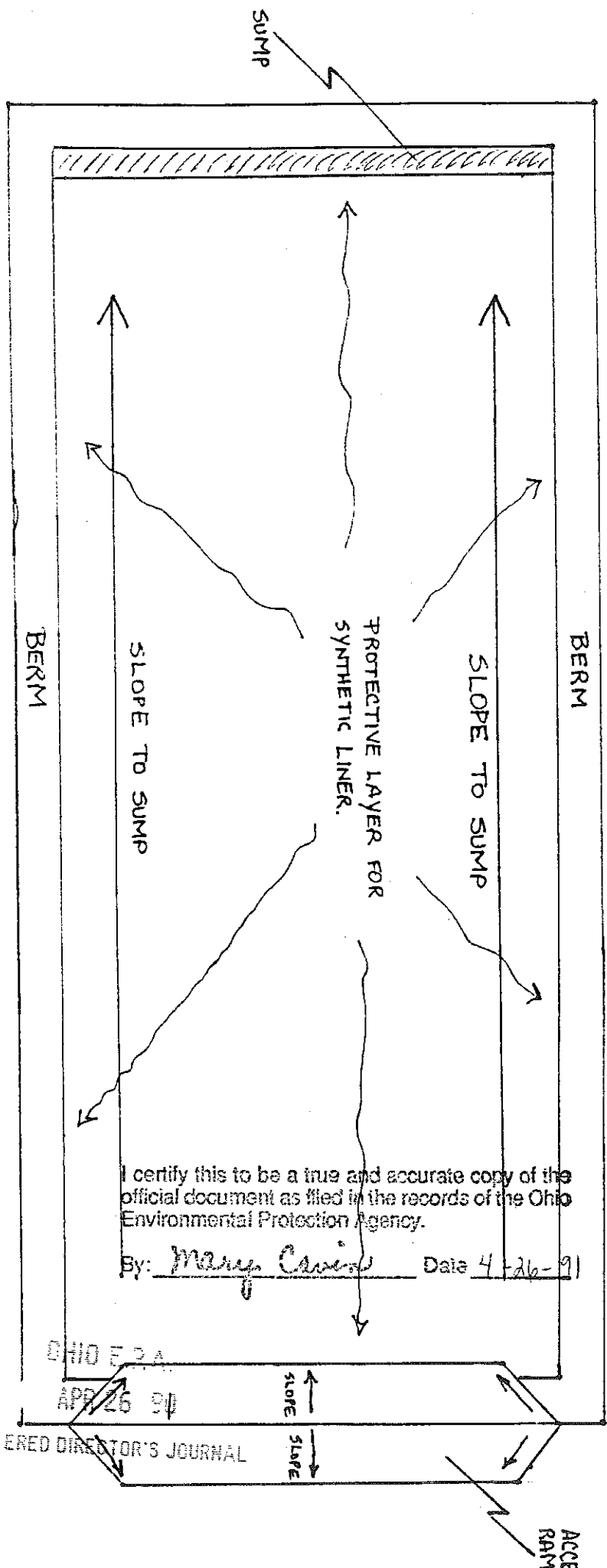
By: Mary Carwin Date 4-26-91

OHIO E.P.A.  
APR 26 91  
ENTERED DIRECTOR'S JOURNAL

# Attachment A



CROSS-SECTION, TYPICAL DECONTAMINATION PAD



I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.  
 By: Mary Carlin Date 4-26-91

OHIO EPA  
 APR 26 91  
 ERD DIRECTOR'S JOURNAL



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.  
Columbus, Ohio 43266-0149

Richard F. Celeste  
Governor

*Ralph  
New LDU  
(Already on closure  
track)*

April 13, 1990

Notice of Deficiency

Frank Moritz *aka: Trailer Master*  
Moritz, Inc.  
400 Park Avenue East  
Mansfield, Ohio 44905

CERTIFIED MAIL

RE: Closure Plan  
Moritz, Inc.  
OHD 982 218 489

Dear Moritz:

On May 16, 1989 Ohio EPA received from Moritz, Inc. closure plan(s) for a hazardous waste landfill at your facility located at 400 Park Avenue East, Mansfield, Ohio.

This closure plan was submitted pursuant to Rule 3745-66-12 of the Ohio Administrative Code (OAC) in order to demonstrate that the Moritz Inc.'s proposal for closure complies with the requirements of OAC Rules 3745-66-11 and 3745-66-12.

The public was given the opportunity to submit written comments regarding the closure plan in accordance with OAC Rule 3745-66-12 and 3745-66-18. The public comment period extended from May 22, 1989 to June 27, 1989. No public comments were received by Ohio EPA.

Pursuant to OAC 3745-66-12(D)(4), I am providing you with a statement of deficiencies in the plan, outlined in Attachment A.

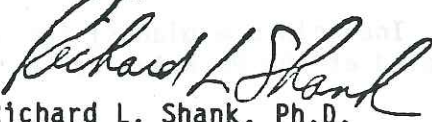
Please take notice that OAC Rule 3745-66-12 requires that a modified closure plan addressing the deficiencies enumerated in Attachment A be submitted to the Director of the Ohio EPA for approval within thirty (30) days of the

Mr. Moritz  
Page Two

receipt of this letter. The modified closure plan should be submitted to: Ohio Environmental Protection Agency, Division of Solid and Hazardous Waste Management, Attn: Thomas Crepeau, Manager, Data Management Section, P.O. Box 1049, Columbus, Ohio 43266-0149. A copy should also be sent to: Janet Boyer, Northwest District Office, 1035 Devlac Grove Drive, Bowling Green, Ohio 43402.

Upon review of the resubmitted plan, I will prepare and issue either a draft or a final action approving or modifying such plan. If you wish to arrange a meeting to discuss your responses to this Notice of Deficiency, please contact Randy Meyer at (614) 644-2956 or Janet Boyer at (419) 352-8461.

Sincerely,



Richard L. Shank, Ph.D.  
Director

RLS/pas

cc: Janet Boyer, NWDO, Ohio EPA  
Chuck Hull, NWDO, Ohio EPA  
Randy Meyer, DSHWM, Ohio EPA  
Tom Crepeau, DSHWM, Ohio EPA  
Lisa Pierard, USEPA Region V  
Joel Morbito, USEPA Region V  
Jan Carlson, DGW, Ohio EPA  
Chris Korleski, AGO, Ohio EPA

2042U

ATTACHMENT A  
Moritz, Incorporated  
OHD 982 218 489

1. DAC 3745-66-12; 40 CFR 265.112

Moritz, Inc. shall include a complete, detailed list of hazardous wastes by chemical name and EPA hazardous waste number. Moritz, Inc. shall also provide an estimate of the maximum inventory of hazardous waste by chemical name and EPA hazardous waste number ever disposed of in the area behind the Paint Building.

2. DAC 3745-66-12(B)(4); 40 CFR 265.112(B)(4)

Because the area behind the Paint Building was operated as a diffuse land disposal unit with no clear boundaries, Moritz, Inc. shall determine the full extent of horizontal and vertical contamination. Soil sampling shall be conducted along a regularly spaced grid. The horizontal sampling interval shall be calculated using  $GI = (A/\pi)^{1/2} / 2$  where GI is the grid interval (units) and A is the area to be gridded (square units). The vertical sampling interval shall be one foot intervals until the soil - ground water interface is intersected. Instead of immediately analyzing all samples, Moritz, Inc. shall do the necessary extractions, where applicable, and preservation for volatiles (Method 8240), EP Toxicity metals (Method 1310), and total metals (Method 6010), and complete the analyses vertically from the ground surface down until three consecutive samples show no contamination. (If a sample exhibits the characteristic of EP Toxicity, there is no need to analyze for total metals.)

Moritz, Inc. shall include an expanded soil sampling and analysis plan including, but not limited to, the following details:

1. Parameters to be analyzed (include any breakdown products);
2. Locations of samples (both surface points and depths) on maps and cross-sectional diagrams;
3. Locations of background samples on maps and cross-sectional diagrams;
4. Sampling methods and equipment (including quality assurance/quality control procedures);
5. Analytical methods;
6. Evidence of a quality assurance/quality control plan for laboratory analyses; and
7. A clear statement of the "clean" level for soil.

3. OAC 3745-66-11; 40 CFR 265.111

Because the area behind the Paint Building was operated as a land disposal unit for hazardous wastes, Moritz, Inc. must determine if this activity has impacted ground water. This shall be accomplished by installing a RCRA, Subpart F ground water monitoring system for the unit after determining the full extent of contamination, and monitoring ground water quality for twelve (12) consecutive quarters after establishing background water quality. The ground water monitoring system's design and sampling and analysis plan shall be submitted as part of the revised closure plan.

4. OAC 3745-66-11; 40 CFR 265.111

Because odor and dust problems are possible during excavation work, Moritz, Inc. shall address air emissions control in the revised closure plan.

5. OAC 3745-66-11; 40 CFR 265.111

Moritz, Inc. shall include a health and safety plan in the revised closure plan which includes, but not necessarily limited to, personal protection levels, personal decontamination, work zones, air monitoring, and emergency procedures.

6. OAC 3745-66-14; 40 CFR 265.114

In addition to scraping soil from equipment used during closure operations, Moritz, Inc. shall decontaminate equipment by washing and rinsing. Rinseate/wash water management procedures shall be described in detail in the revised closure plan.

To avoid cross-contamination, all reuseable sampling equipment and drilling tools shall be decontaminated before taking the next sample or proceeding to the next work location.

7. OAC 3745-66-11; 40 CFR 265.111

Soils contaminated with any RCRA regulated waste solvent above its analytical detection limit (see U.S. EPA Publication SW-846) or with EP Toxicity metals above the maximum concentrations specified in OAC 3745-51-24 shall be removed and managed as a hazardous waste. Soils contaminated with metals (using total metals analysis) at greater than background levels, but not meeting the characteristic of EP Toxicity, shall be removed and managed as solid waste. Soils shall be sampled for organics (Method 8240) and EP Toxicity (Method 1310) first. If the soil is contaminated with organics or meets the characteristic of EP Toxicity, total metals analysis (Method 6010) is unnecessary.

Background for soils shall be established by taking sixteen (16) soil samples from an area that has not been directly influenced by facility processes or other waste disposal activities. Location of background samples and statistical methods demonstrating normality of the samples along with the mean and standard deviation shall be submitted to Janet

Boyer, Ohio EPA, Northwest District Office, and Randy Meyer, Ohio EPA, Central Office. Upon approval of the data by Ohio EPA, Moritz, Inc. shall use a value of two positive standard deviations from the mean as the established background for metals.

8. OAC 3745-66-13(A); 40 CFR 265.113(a)

Moritz, Inc. shall contact Janet Boyer, Ohio EPA, Northwest District Office, at least five (5) days in advance of certain critical activities, such as soil sampling or removal, so that the inspector may be present to observe these activities.

9. OAC 3745-66-12; 40 CFR 265.112

If Moritz, Inc. discovers that clean closure by removing all contaminated soil or confirmation that ground water has not been impacted by waste management activities is impossible, an amended closure plan describing landfill closure in compliance with OAC 3745-68-10 and other applicable closure regulations shall be submitted within 30 days.

10. OAC 3745-66-12(B)(4); 40 CFR 265.112(B)(4)

Moritz, Inc. shall include a description of solidification/stabilization activities, stockpiling of waste, equipment, removal pattern and depth increments, loading areas or any other steps critical to removal. The revised closure plan shall clearly define how contaminated soil will be removed, stored, loaded, and managed once it leaves the property.

11. OAC 3745-66-15; 40 CFR 265.115

In addition to an independent, registered, professional engineer, an authorized representative of Moritz, Inc. must certify within 60 days of completion of closure that the closure plan was completed in accordance with the approved closure plan. Moritz' certification must follow the signature requirements found in OAC 3745-50-42.

12. OAC 3745-66-11; 40 CFR 265.111

In order to limit the spread of further contamination, Moritz, Inc. shall include in the revised closure plan measures to control runoff and runoff from the waste disposal area.

13. OAC 3745-66-42; 40 CFR 265.142

In the revised closure plan Moritz, Inc. shall submit a detailed closure cost estimate. The estimate shall be based on third party costs, and must be sufficiently detailed to allow a outside contractor to make an accurate bid to effect clean closure of the waste disposal area.



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.  
Columbus, Ohio 43266-0149

Richard F. Celeste  
Governor

May 17, 1989

*W075 fsc*  
Re: Moritz, Inc.  
U.S. EPA ID No.: OHD982218489  
Ohio Permit No.: 03-70-00BW  
Closure Plan

Moritz, Inc.  
Attn: Mr. Frank Moritz  
400 Park Avenue East  
Mansfield, Ohio 44905

Dear Mr. Moritz:

A public notice acknowledging the Ohio EPA's receipt of a closure plan for Moritz, Inc. located at 400 Park Avenue East, Mansfield, Ohio 44905 will appear the week of May 22, 1989 in the Mansfield News Journal, Mansfield, Ohio. The Director of the Ohio EPA will act upon the closure plan request following the close of the public comment period, June 27, 1989.

Copies of the closure plan will be available for public review at the Mansfield-Richland County Public Library, 43 W. Third Street, Mansfield, Ohio 44902 and the Ohio EPA, Northwest District Office, 1035 Devlac Grove Drive, Bowling Green, Ohio 43402.

Please contact me at (614) 644-2977, if you have any questions concerning this matter.

Very truly yours,

*Thomas E. Crepeau*

Thomas E. Crepeau, Manager  
Data Management Section  
Division of Solid and Hazardous Waste Management

TC/PW/ds/closurereceipt

cc: Lisa Pierard, U.S. EPA, Region V  
Randy Meyer, Ohio EPA, DSHWM, TA&ES  
Janet Leite, Ohio EPA, DSHWM, NWDO

**RECEIVED**  
MAY 22 1989  
OFFICE OF RCRA  
Waste Management Division  
U.S. EPA, REGION V

**PUBLIC NOTICE**

Richland County

**RECEIPT OF HAZARDOUS WASTE CLOSURE PLAN**

For: Moritz, Inc., 400 Park Avenue East, Mansfield, Ohio 44905, U.S. EPA ID No.: OHD982218489, Ohio Permit No.: 03-70-00BW. Pursuant to OAC Rule 3745-66-10 thru 17 and 40 CFR, Subpart G, 265.110 thru 117, the Ohio Environmental Protection Agency (Ohio EPA) is hereby giving notice of the receipt of a Hazardous Waste Facility Closure Plan for a landfill for the above referenced facility. Ohio EPA is also giving notice that this facility is subject to a determination concerning corrective action, a requirement under the Hazardous and Solid Waste Amendments of 1984, which concerns any possible uncorrected releases of hazardous waste or hazardous constituents to the environment from any current or previous solid waste management units at the above facility. A corrective action determination is required from hazardous waste facilities intending to close.

Copies of the facility's Closure Plan will be available for public review at the Mansfield-Richland County Public Library, 43 W. Third Street, Mansfield, Ohio 44902 and the Ohio EPA, Northwest District Office, 1035 Devlac Grove Drive, Bowling Green, Ohio 43402. Comments concerning the Closure Plan or factual information concerning any releases of hazardous waste or hazardous waste constituents by the above facility requiring corrective action should be submitted within 30 days of this notice to: Ohio Environmental Protection Agency, Div. of Solid & Hazardous Waste Mgmt., Data Management Section, Attn: Thomas E. Crepeau, Box 1049, Columbus, Ohio 43266-0149.

OH-D982218489

CLOSURE PLAN  
FOR  
MORITZ, INCORPORATED  
May 1989

Moritz, Incorporated  
400 Park Avenue East  
Mansfield, Ohio 44905

RECEIVED  
MAY 18 1989  
U. S. EPA, REGION V  
SWB - PMS

## CLOSURE PLAN

Moritz, Incorporated  
400 Park Avenue East  
Mansfield, Ohio 44905

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2. DESCRIPTION OF FACILITY
3. DESCRIPTION OF WASTE MANAGEMENT UNIT TO BE CLOSED
4. MAP OF FACILITY
5. DRAWING OF UNIT TO BE CLOSED
6. LISTS OF HAZARDOUS WASTES
7. SCHEDULE FOR CLOSURE
8. AIR EMISSIONS
9. PERSONAL SAFETY AND FIRE PREVENTION
10. DECONTAMINATION EFFORTS
11. "CLEAN" LEVELS FOR SOIL
12. SOIL SAMPLING AND ANALYTICAL METHODS
13. DESCRIPTION OF REMOVAL EFFORTS
14. SPECIFICS FOR LANDFILL CLOSURE.
15. DESCRIPTION OF EQUIPMENT CLEANING
16. CERTIFICATION
17. STATUS OF FACILITY AFTER CLOSURE

## CLOSURE PLAN

Moritz, Incorporated  
400 Park Avenue East  
Mansfield, Ohio 44905

## EXHIBITS

<u>Exhibits</u>	<u>Description</u>
A.	Moritz, Inc. - Site Plan for Waste Management Unit to be Closed
B.	Topographic Map - Facility Location
C.	Moritz Inc. - Results of Lab Analysis - Ohio EPA Samples
D.	Soil Sample Location Map
E.	Microbac Laboratories, Inc. Laboratory Control Plan
F.	Moritz Inc. - Results of Lab Analysis - Moritz Samples (Wadsworth/Alert Laboratories, Inc.)

## CLOSURE PLAN

Moritz, Incorporated  
400 Park Avenue East  
Mansfield, Ohio 44905

### 1. INTRODUCTION

This Closure Plan for Moritz, Inc. has been prepared in accordance with the regulatory requirements set forth in 40 Code of Federal Regulations (CFR) 265.11 and Ohio Administrative Code (OAC) 3745-66-12, and in response to Case No. 88.587-H, COMPLAINT FOR INJUNCTIVE RELIEF AND CIVIL PENALTIES, filed by the State of Ohio on October 4, 1988.

This Plan outlines the steps that will be taken to remove the contaminated soil at the Moritz facility, disposing of the soils in a secure hazardous waste facility, and the sampling, monitoring and reporting activities that will be conducted to insure complete clean up and closure of the contaminated areas, thus minimizing to the extent necessary, the potential to endanger human health and the environment.

### 2. DESCRIPTION OF FACILITY

Moritz, Incorporated is a trailer fabrication facility, located at 400 Park Avenue East, Mansfield, Ohio, 44905, which fabricates approximately fifty (50) horse trailers per month. The major steps of this fabrication process is shaping and welding the steel, preparing the trailers for painting (cleaning with toluene), and spray painting of the trailers in a spray booth (xylene mixed with the paint). The two (2) hazardous waste constituents generated during this production process are toluene (less than 55 gallons per month) and xylene (less than 55 gallons per month).

### 3. DESCRIPTION OF WASTE MANAGEMENT UNIT TO BE CLOSED

The Ohio EPA and Moritz, Inc. have agreed to define the area of "waste management unit to be closed" as the ground area immediately outside of the paint building, totaling approximately 7,000 square feet, as illustrated in Exhibit A. identified as "Moritz, Inc. - Site Plan for Waste Management Unit to be Closed".

4. MAP OF FACILITY

Exhibit B. is attached hereto and depicts the location of the facility on a topographic map, and further identifies the waste management unit as illustrated in Exhibit A.

5. DRAWING OF UNIT TO BE CLOSED

Attached hereto is Exhibit A which depicts the waste management unit to be closed, as described in Item 2.

6. LISTS OF HAZARDOUS WASTES

Soil outside of the paint building contains paint wastes and solvents as based upon laboratory analyses conducted by the Ohio EPA on samples collected by the agency's representatives on May 7, 1987. The results of the lab analysis along with the sample number, sample identification, sample location, and parameter of analysis for the Ohio EPA samples are detailed in the attached Exhibit C.

In addition, the attached Exhibit F. illustrates the laboratory results of a composite soil sample collected by a representative of 7 & 7, Inc. on May 18, 1988, which was analyzed by Wadsworth/Alert Laboratories, Inc.

7. SCHEDULE FOR CLOSURE

Moritz, Incorporated will begin, pursuant to the responsibilities assigned to the company's contractor and engineer, sampling, removing, and transporting of the contaminated soil to a licensed hazardous waste facility in accordance with the approved Closure Plan. The SCHEDULE FOR CLOSURE, predicated on the Ohio EPA's approval, is as follows:

## IMPLEMENTATION SCHEDULE FOR SITE CLOSURE

<u>Scheduled Activity</u>	<u>Time Period</u> <u>Following Ohio</u> <u>EPA approval</u>
a. Begin soil sampling for horizontal and vertical characterization to determine the exact location and amount of soil to be removed from the site and the location of ground water monitoring facilities as may be required by the regulatory agencies, and if so, -----	7 days
b. Submittal of such detailed plans and "Schedule of Implementation for Groundwater Monitoring" as a supplement to this Closure Plan for review and approval by the Ohio EPA.	45 days
c. Permit received from hazardous waste facility to accept the soil.	60 days
d. Soil excavated by the contractor, 7 & 7, Incorporated, and hauled to the approved hazardous waste facility.	90 days
e. Submittal of Final Engineering Report and Certification of Site Closure.	120 days

8. AIR EMISSIONS

There will be no air emissions nor nuisance problems such as odors or dust related to this closure.

9. PERSONAL SAFETY AND FIRE PREVENTION

Contractors and employees in the area will be notified by posting and verbal communication as to the activities that will be undertaken at the site and the precautionary measures to be followed in the event of an emergency. Some of these precautionary measures are detailed as follows:

- Spills: For chemical spills, non reactive absorbent material will be readily available to be used in the event of a spill, which would then be transferred to a drum for containment and ultimate transportation and disposal to the hazardous waste facility approved for such.

- Fire: Fire extinguishers are located on site. In addition, the telephone numbers for the local emergency fire and EMS services will be posted in the area.

- Protective Apparel: Protective apparel will be available and worn whenever and wherever necessary to protect all workers in the immediate area where the clean-up activities are taking place.

10. DECONTAMINATION EFFORTS

All equipment used by the contractor working in the contaminated area will be scraped clean of contaminated soil and disposed of at the approved hazardous waste facility with the other soils from the site.

11. "CLEAN" LEVELS FOR SOIL

Periodic sampling, sample monitoring locations, and continuous on site inspection and supervision of all excavation activities will be conducted by the independent registered engineer, Cook Environmental Engineering (CEE) and/or Moritz, Inc. management personnel, to insure that all contaminated soil is excavated from the site and properly hauled away to the permitted hazardous waste facility. Contaminated soil is defined in this Plan as soil containing naturally occurring elements or compounds in the area of the waste management unit having concentrations in the soil which exceed the mean of the background samples plus two (2) standard deviations.

## 12. SOIL SAMPLING AND ANALYTICAL METHODS

The soil sampling and analysis plan is detailed as follows:

### a. Parameters to be analyzed.

Solvent Scan - EPA 624 Violates  
P-Naphtha  
Toluene  
Xylene  
High Flash Naphtha  
Flash Point  
Total metals (As, Ba, Cd, Cr, Pb, Hg, Se, & Ag)

### b. Sample Location (Surface points and depths)

The soil samples to be taken will be at the three (3) surface locations depicted in Exhibit D. (Soil Sample Location Map), as attached hereto.

Each of the three (3) surface sample locations will consist of three (3) discrete samples, one representative of the soil from the ground surface down to 12" in vertical depth, the second representative of the soil from 12" to 24" in depth, and the third representative of the soil from 24" to 36" in depth.

### c. Background Samples

At least two (2) background samples will be taken at the surface locations depicted in Exhibit D, which will be representative of the depth of contamination determined by the nine (9) soil samples collected in the waste management unit.

### d. Sampling Methods

The method of sampling will consist of utilizing a stainless steel hand auger to extract core samples to the previously indicated soil depths, cleaning the auger by rinsing with tap water after the extraction of each core sample, and combining the individual core samples collected so that each composite sample is representative of the soil's vertical depth discussed in Section 11.b. at each of the three (3) surface sample locations.

e. Laboratory Control Plan

The Laboratory Control Plan to be used by the laboratory which will be conducting the analyses (Microbac Laboratories, Inc.), consists of the analytical methods to be used, the quality assurance control, and the chain of custody for the samples, all of which are detailed in Exhibit E, and attached hereto.

f. A Clear Statement of the "Clean" Level for the Soil.

A clear statement of the "clean" level for the soil will be provided by the independent registered engineer for this Closure Plan (Cook Environmental Engineering), which will be based upon the analytical data received from Microbac Laboratories, Inc. for the samples collected, as previously detailed within the context of this Plan.

13. DESCRIPTION OF REMOVAL EFFORTS

As previously discussed, Moritz, Incorporated has contracted the services of 7 & 7, Incorporated to excavate the contaminated soil and transport it to a licensed hazardous waste facility for ultimate treatment and/or disposal.

The removal efforts will consist of 7 & 7, Inc. using a backhoe and front end loader to excavate the soil and load it into a sealed container which will be covered during transport to one of the following waste disposal facilities:

Chemical Waste Mgmt Inc.  
11700 S. Stoney Island Ave.  
Chicago, Illinois 60617  
Ph (312) 646-5700  
EPA # ILD000672121

Chemical Waste Mgmt Inc.  
P.O. Box 55  
Route # 1 Highway 17  
Emmelle, Alabama 35459  
Ph (205) 652-9721  
EPA # ALD000622464

Chemical Waste Mgmt Inc.  
4636 Adams Center Road  
Ft. Wayne, Indiana 46806  
Ph (219) 447-5585  
EPA # IND078911146

ENSCO Inc.  
Energy Systems Co.  
P.O. Box 1957  
American Road  
ElDorado, Arkansas 71730  
Ph (501) 863-7173  
EPA # ARD069748192

APTUS  
P.O. Box 1328  
Hwy. 169 North

Coffeyville, KS 67337  
Ph (316) 251-6380  
EPA # KSD980964993

The waste management unit will then be back filled with clean soil and the surfaced finished to blend with the surrounding area of the property.

14. SPECIFICS FOR LANDFILL CLOSURE.

The Moritz facility described in this Plan does not contain any landfills or surface impoundments to be closed, thus this section does not apply to this facility.

15. DESCRIPTION OF EQUIPMENT CLEANING

All equipment used by 7 & 7, Inc. for excavation and transportation purposes will be scraped clean of contaminated soil and disposed of at the same licensed facility where the other soils will be disposed.

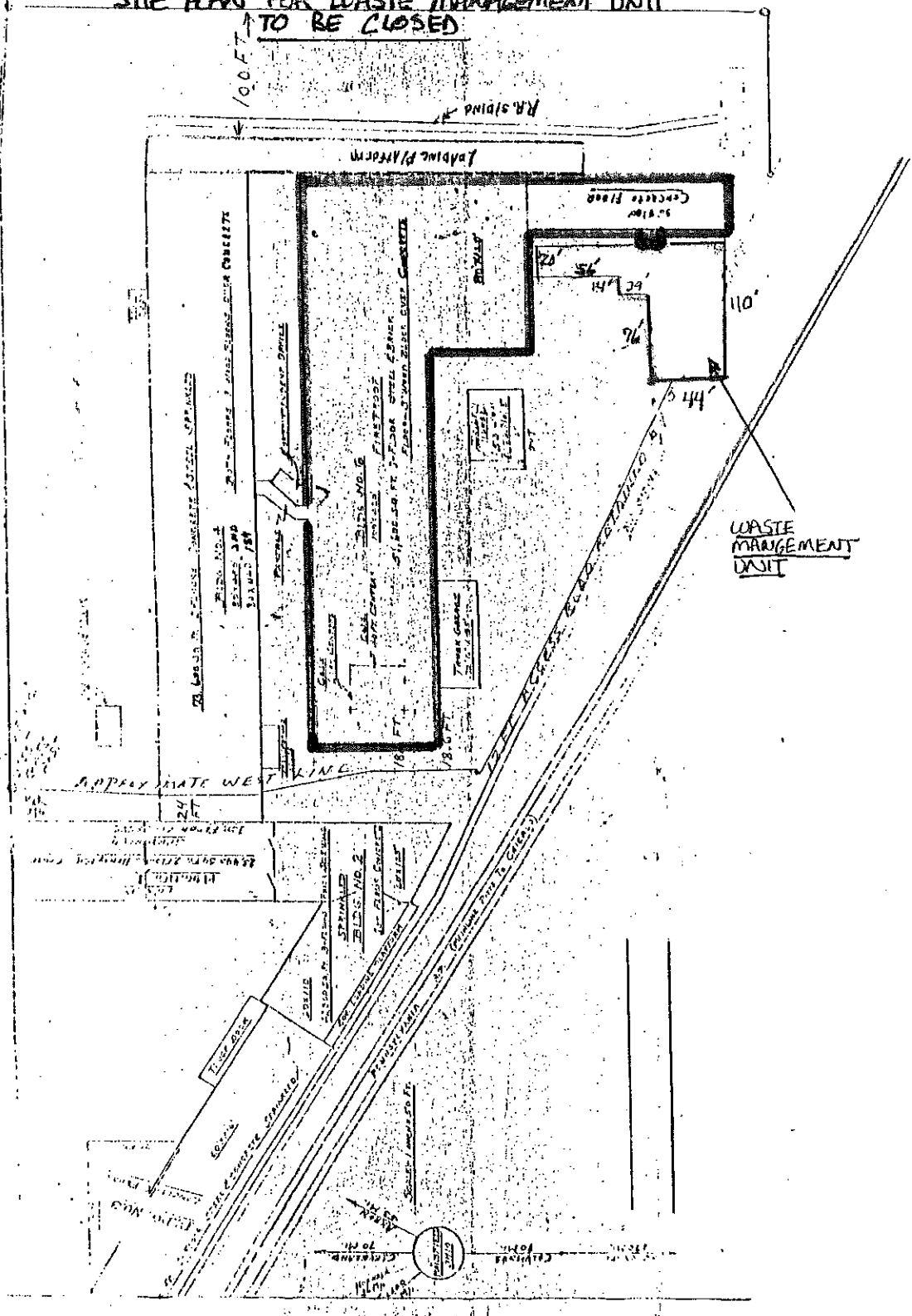
16. CERTIFICATION

The closure activities will be supervised by the independent engineering firm, Cook Environmental Engineering (CEE), who has been retained by Moritz, Inc. for this project. All closure activities will be certified by Leonard C. Cook, P.E., of CEE, an independent registered professional engineer. CEE will be present at all critical activities which include, but are not limited to, sampling, soil excavation, equipment cleaning and clean-up. The frequency and duration of the on site inspection by CEE will be determined by CEE at the time the activity is being conducted so as to be assured for certification purposes that each critical closure activity is properly conducted and thoroughly completed.

17. STATUS OF FACILITY AFTER CLOSURE

After closure of this waste management unit is completed, no units will remain in operation.

10077



# Roseland



1960  
PHOTO REVISÉ 1982  
DMA 4465 I SE SERIES V852

## EXHIBIT C.

MORITZ, INC.

Results of Lab Analysis Ohio EPA Samples

MORITZ COMPANY

RESULTS OF LAB ANALYSIS

Samples collected by Ohio EPA (C. Kleinhenz &amp; R. Walton) on May 7, 1987.

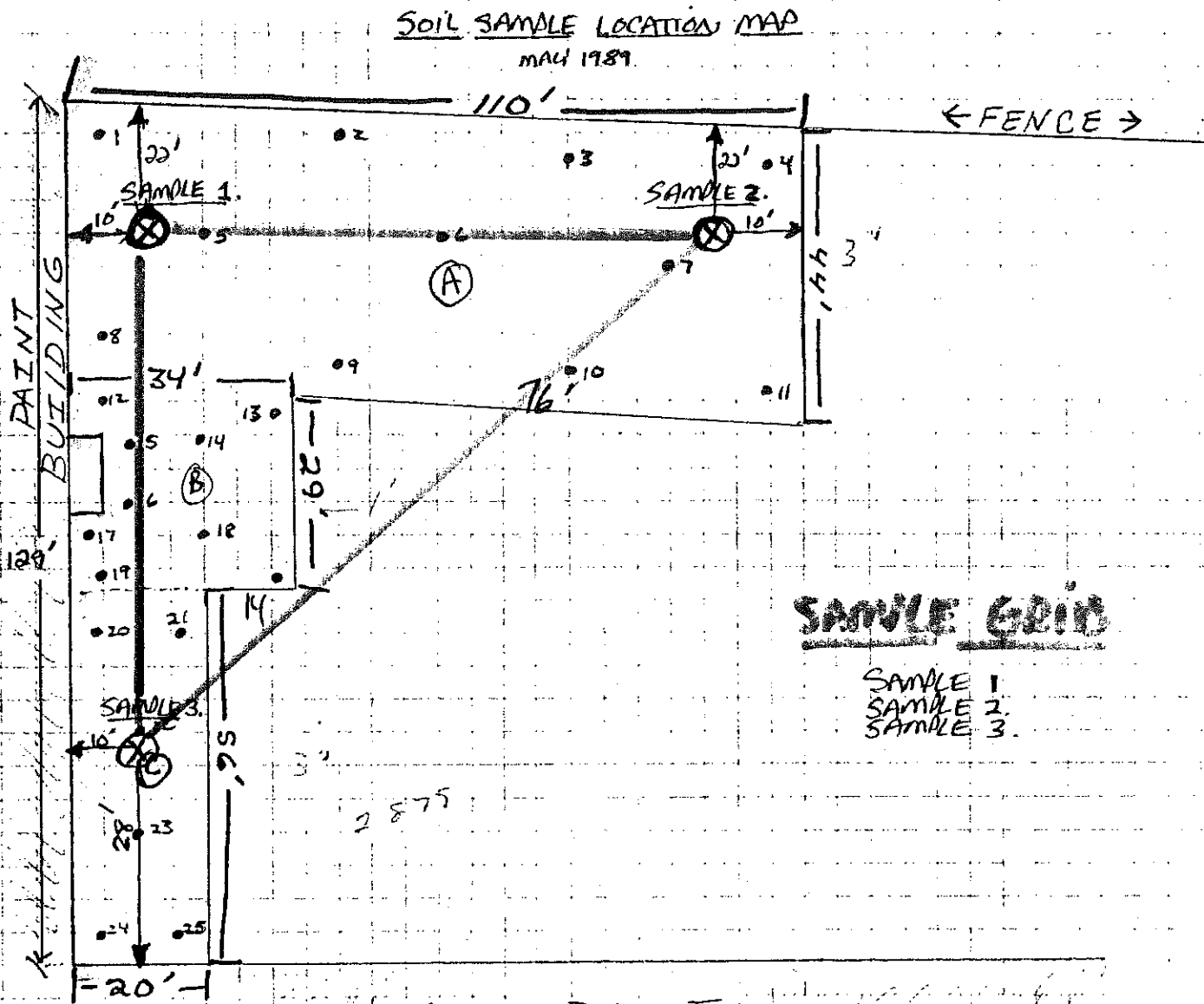
SAMPLE #	DESCRIPTION	LOCATION	PARAMETERS	ANALYSIS
NO. 1	Dry floor sweepings (red & multi-color of paint).	Pile outside	EPTOX-LEAD	3.54 ug/l
NO. 2	Dried green paint in soil	Outside	EPTOX-LEAD	<0.5 ug/l
NO. 3	Soil at 60 feet	Chemical Building	H-NU READING	65 FPM
SAME	Soil at 60 feet	Chemical Building	SOLVENT SCAN	0 DETECTED
				WEIGHT/WEIGHT
NO. 4	Soil from the fence area	Next to Caddy	SOLVENT SCAN VM & P-NAPHTHA	0.2% W/W
				-TOLUENE 0.2% W/W
				-XYLENE 1.3% W/W
				-HIGH FLASH NAPHTHA 0.7% W/W
				FLASH POINT ( <80° F)
NO. 5 OR 5A	Buried red paint	Near fence adjacent to Sample #4	SOLVENT SCAN- TOLUENE	0.5% W/W
				- XYLENE 7.0% W/W
				- MINERAL SPIRITS 6.0% W/W
				FLASH POINT ( 105° F)
NO. 5B	Red Paint-buried near fence	Near sample #4	EPTOX-LEAD	<0.5 ug/l
NO. 6	Soil sample	Located at fence near bldg closer than sample #4.	SOLVENT SCAN- VM & P-NAPHTHA	0.2% W/W
				- TOLUENE 0.1% W/W
				- XYLENE 0.5% W/W
				- HIGH FLASH NAPHTHA 0.1% W/W
				FLASH POINT ( <80° F)
NO. 7A	Fresh floor sweeping	Paint room	SOLVENT SCAN- XYLENE	0.84 ug/l
				- HIGH FLASH NAPHTHA 1.24 ug/l
				FLASH POINT ( >230° F)

MORITZ COMPANY  
RESULTS OF LAB ANALYSIS  
Samples collected by Ohio EPA (C. Kleinhenz & R. Walton) on May 7, 1987.

---

SAMPLE #	DESCRIPTION	LOCATION	PARAMETERS	ANALYSIS
NO. 7B	Fresh floor sweepings	Paint room	EPIOX-LEAD	<0.5 mg/l
				WEIGHT PER VOLUME
NO. 8	Liquid from 5-gallon paint can	Located outside Chemical Bldg.	SOLVENT SCAN- VM & P-NAPHTHA	8.5% W/V
			- TOLUENE	8.7% W/V
			- XYLENE	50.7% W/V
			- HIGH FLASH NAPHTHA	10.4% W/V
			FLASH POINT	( <75° F)
NO. 9	Liquid from drip bucket	Underneath xylene drum	SOLVENT SCAN- VM & P-NAPHTHA	20.6% W/V
			- TOLUENE	19.1% W/V
			- XYLENE	37.8% W/V
			- HIGH FLASH NAPHTHA	4.3% W/V
			FLASH POINT	( <75° F)
NO. 10	Soil sample	Adjacent to the Chemical bldg.	SOLVENT SCAN- VM & P-NAPHTHA	1.9% W/W
			- TOLUENE	2.4% W/W
			- XYLENE	2.4% W/W
			- HIGH FLASH NAPHTHA	2.5% W/W
			FLASH POINT	( <72° F)

EXHIBIT D.



SAMPLE GRID

SAMPLE 1  
SAMPLE 2  
SAMPLE 3

ASSY. PLANT

AREA

A = 4840 SF  
B = 986 SF  
C = 1120 SF  
6946 SF

DEPTH OF REMOVAL

1'  
2'  
3'

CUBIC FEET

6946 CF  
13,892  
20,838

YDS.

260 YDS  
520  
780

EST. TONS

390 TONS  
780  
1170

EXHIBIT E.

MICROBAC LABORATORIES, INC.  
LABORATORY CONTROL PLAN.



# Microbac Laboratories, Inc.

Schiller Division

449 Rochester Road Pittsburgh, Pennsylvania 15237-1733

412/369-4830

Air • Fuel • Water • Food • Wastes

## QUALITY ASSURANCE SUMMARY

MICROBAC LABORATORIES, INC.  
SCHILLER DIVISION

Prepared by  
  
David J. Danis  
Lab Director

This report is rendered upon the condition that it is not to be produced wholly or in part for advertising or other purposes over my signature or in connection with my name without special permission in writing.

Laboratories serving states east of the Mississippi

USDA-EPA-NIOSH testing • Food Sanitation Consulting • Chemical and Microbiological Analyses and Research

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- V. Additional Considerations
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- VII. Thermonmeter Calibration
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- IX. Sample Bottle Preparation
- X. Sample Preservation
- XI. Quality Control for Metal Analysis
- XII. Chain of Custody



The following tables and graphs are ment to assist in the validation of data generated from spectrographic, chromatographic and wet chemical methods performed in the laboratory.

They are in no way compiled to replace the routine checking of calculations, prudent observation of the test and timely review of data, but to serve as indicators that a particular test procedure is failing , analytical instrumentation is operating improperly or that there has been an analyst's error in technique.

For background and theory of Quality Assurance in the laboratory, refer to:

Manual for the Certification of Laboratories Analyzing Drinking Water;Criteria and Procedures/Quality Assurance; EPA 570/9-82-002

Handbook for Analytical Quality Control in Water and Wastewater Laboratories; EPA Technology Transfer, June 1972

Quality Assurance, a Laboratory Management Practice Manual; American Council of Independent Laboratories, Inc. May 1986

A Guide to Quality Conrol Practices for Waste and Potable Water Analysts; Environmental Resource Associates, Nov 1978

Test Methods for Evaluating Solid Waste, 3rd Edition, EPA SW-846

Standard Methods fot the Examination of Water and Wastewater, 16th edition APHA

Methods for Chemical Analysis of Water and Wastes, EPA 600/4-79-020, March 1979



### SAMPLING AND ACCEPTANCE OF SAMPLES

The following protocol MUST be followed in the acceptance and analysis of drinking waters for reporting to PADER.

#### SAMPLING:

Water samples collected MUST be taken in properly prepared and preserved sample containers. Refer to; Sampling Procedures; EPA 600/2-80-018

##### A. Trace Metals

Refer to; Sampling Procedures; EPA 600/2-80-018 section 6  
Containers may be glass or plastic, first rinsed with 1:1 HNO<sub>3</sub>, tapwater, 1:1 HCL, tapwater, and with final rinsings of deionized water

Preservant: HNO<sub>3</sub> to pH <2, approx. 5 ml/liter sample

Sample Size: 1 liter

Holding Time: 6 months, Mercury analysis in 7 days

##### B. Nitrate Nitrogen

Containers may be glass or plastic, detergent washed and rinsed with tapwater and final rinsings with deionized water

Preservant: H<sub>2</sub>SO<sub>4</sub> to pH <2; refrigerate 4°C, approx. 0.5ml acid per 100ml sample

Sample Size: 50 ml minimum

Holding Time: 14 days

##### C. Fluoride

Containers should be plastic, detergent washed and tapwater rinsed with final rinsings with deionized water

Preservant: none, suggest holding at 4°C until analysis

Sample Size: 100 ml minimum

Holding Time: 1 month

D. Sodium/Corrosivity

Sodium/Calcium - prepare as in Trace Metals Section

Ph/TDS/Alkalinity - prepare as in Fluoride Section

Sample Size: 250 ml minimum

Holding Time: Analyze as soon as possible

E. Herbicides/Pesticides

Refer to EPA 570/9-82-002 Certification Manual, Sec 6.3

Containers: Glass with foil or teflon lined caps, solvent  
rinsed and muffled at 180°C for 2 hours

Preservant: Refrigerate at 4°C

Sample Size: 2 liters

Holding Time: Chlorinated hydrocarbons - 14 days

Chlorophenoxy - 7 days

F. TTHM

Refer to EPA 570/9-82-002 Certification Manual, Sec. 6.3

Containers: Glass with teflon lined septum, containing  
sodium thiosulfate

Sample Size: 2 tubes and fill blank, refrigerate 4°C

Holding Time: 28 days

G. VOC

Refer to EPA 570/9-82-002 Certification Manual, Sec. 6.3

Containers: Prepare as in TTHM except omit thiosulfate and  
add HCL 1;1

Sample Size: 2 tubes and fill blank, refrigerate

Holding Time: 28 days

H. Additional Testing Requirements

Refer to: EPA 600/4-79-020 Methods for Analysis of Water  
and Waste, Table 1 (included)

### Procedure for Sampling By Schiller Personnel:

1. Select and prepare proper containers
2. Select sampling point at entry into distribution system unless otherwise specified.
3. Remove all aspirators or filters from faucet prior to sampling. Run cold water full force for 4-5 minutes before filling containers.

NOTE: At NO TIME shall water be taken from a hot water source.

Draw samples only from the cold side.

4. Record on the sample label; and on the sample submission form

Name of customer	Temperature
------------------	-------------

PWSID number, if available

Source, either well, spring etc.

Sampling point

Date taken

Time taken

Samplers name or initials ; Lab ID #

5. Take sample.

6. Return to laboratory in a timely fashion, refrigerating if called for.

ACCEPTANCE:

Upon receipt of a sample,

- Verify that appropriate sample containers have been used
- Verify that correct preservative has been added
- Verify that holding times have not been violated
- If any of the above can not be guaranteed, REJECT the sample and request that it be resampled.
- If acceptable, assign the sample a laboratory analysis number and log entry into check-in book. See 4 if Microbac Sampled
- Place Lab number on sample bottle/bottles. See 4 if Microbac sampled
- Complete check-in sheet with sampling information and the analyses to be run. See 4 if Microbac sampled
- Transfer to lab for appropriate storage and analysis.
- If outside testing is to be done, make sure a copy of the purchase order and check-in sheet goes on the outside testing board before the sample is sent out



### QA/QC CHECK FREQUENCY

#### Spectrographic Methods:

Once a standard curve consisting of a reagent blank and at least three standards with one standard at or below the MCL has been made,

- for each subsequent test, a reagent blank and at least one standard must be run and agree within 10% of the original curve.
- for each 10 analyses, a duplicate sample must be run with percent error no greater than 15%.
- for each twenty analyses, a spiked sample or standard addition must be run with percent recovery between 85 to 115%.
- outside reference samples should be run regularly. Results should fall within the 95% CI for the samples.

If any of the above criteria are not met, this indicates an out of control situation and the source of error must be identified and corrected prior to any further analyses or rechecking of results. Special provisions may need made for greater error margins on duplicates or spikes at or near the test detection limits, or for those samples well past the linear range of the procedure that require large dilutions to bring them within working ranges of the method. These would be in the range of 15-25% for some procedures; ie- low ppb metals, low ppb phenol etc., 1-1000+ dilutions.

#### Wet Chemistry Methods:

Once a particular wet chemistry reagent has been made, as in the case of a titrant-

- periodic, routine restandardization should be performed, and changed normalities or strengths should appear on the reagent bottle along with the date the change was made and the initials of the chemist that restandardized the titrant

Wet Chem con't.

- for each 10 analyses, a duplicate sample must be run with percent error no greater than 15%.
- for each 20 analyses an outside reference standard should be run with results falling within the 95% CI for the sample.

If any of the above criteria are not met, this indicates an out of control situation and the source of error must be identified and corrected prior to any further analyses or rechecking of results.

Chromatographic Methods:

Once a standard curve consisting of a reagent blank and at least three standards with one at or below the MCL has been made,

- for each subsequent test, a reagent blank and one standard must be run and agree within 10% of the original curve.
- for each 10 analyses, a duplicate sample must be run with percent error no greater than 20%.
- for each twenty analyses, an outside reference sample should be run. Results should fall within the 95% CI for the sample.
- a change in procedure or setup, ie-new column, will necessitate remaking of the standard curve.

If any of the above criteria are not met, this indicates an out of control situation and the source of error must be identified and corrected prior to any further analyses or rechecking of samples.

CONTROL CHARTS: Once sufficient background data has been gathered, control charts should be developed for every procedure in the laboratory for which routine Q/C measurements are taken. Once the cusum chart has been made, it should be interpreted as follows;

- each routine check within 2 standard deviation of the mean is within quality control limits
- any point falling outside 2 standard deviation but inside 3 or 7 consecutive points on one side of the mean both indicate a warning situation that must be corrected prior to further analyses.
- any point falling outside 3 standard deviation indicates an out of control situation and analyses must stop until the problem is corrected and results are rechecked.



### ADDITIONAL CHECK FREQUENCY

#### THERMOMETERS

All lab thermometers must be numbered and labelled with their corrections as determined against a certified NBS thermometer. Measurement should take place at or near their temperature of use.

Frequency- every 6 months.

#### ANALYTICAL BALANCE

In addition to routine yearly service checks, the analytical balance should be checked routinely against class S weights to verify its accuracy to 1 milligram.

Frequency- weekly

#### REFRIGERATORS/INCUBATORS

Temperature, as determined by a thermometer calibrated against an NBS thermocouple should be checked routinely and recorded.

Frequency- daily

#### DISTILLED/DEIONIZED WATER

Check pH, conductivity and free chlorine. Conductivity not to exceed 2 micromhos, pH to fall between 6.0-8.0 and no chlorine should be present. If any of these criteria are not met, an alternative source must be found until remedied.

Frequency - weekly



## ADDITIONAL CONSIDERATIONS

### CHEMICALS/REAGENTS

All chemicals should be of ACS grade or of good quality when used as reagents or in the preparation of reagents for tests performed in the lab.

All materials used for calibrating instruments or as standards in developing a method should be of primary standard grade or at minimum, traceable back to an NBS source. While this is not always available, these chemicals should be of the highest quality available and kept refrigerated, dessicated or dried at 103°C for 1 hour prior to use as specified for each compound.

All chemicals received into the lab must be dated upon receipt and discarded after any declared expiration date. Chemicals without expiration dates must demonstrate their efficacy before uses if it is questionable.

### GLASSWARE

All volumetric glassware and volumetric pipets should be Class A.

All graduated cylinders used to measure a sample aliquot should be marked TO DELIVER.

Glassware should be free from discoloration, scoring or broken edges, and should be washed with soapy water and tap rinsed prior to the glassware prep specified in EPA 600/79-4-020.

## NON-STANDARDIZED PROCEDURES

ANY non-standardized procedure used in the laboratory must be proven equivalent to its standardized counterpart or effective if a set procedure is not available before its use on any sample.

This should be done by a comparative study between the two procedures and should encompass duplicate and spiked samples for both. Error between both procedures should be no more than 10%.

If there is no procedure to compare against, duplicate and spike data should show no more than 15% error.

Once a method has been shown effective, a standard operating procedure should be written up and placed in the Quality Control Manual for further reference and investigation of interferences.

This will also apply to preparation techniques and operations.

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Schiller Division 449 Rochester Road Pittsburgh, Pennsylvania 15237-1733 412/369-4830



### THERMOMETER CALIBRATION

OCT. '87

Therm. #	<u>Temp.</u>		<u>NBS</u>		<u>Deviation</u>
1	34.0	45.0	34.2	45.2	.2 low
3	20.8	2.0	20.8	2.0	none
4	46.0	45.0	47.0	46.0	1.0 low
5	46.0	60.0	46.0	60.0	none
6	43.0	64.0	42.0	63.0	1.0 high
7	45.0	61.0	48.0	64.0	3.0 low
8	34.0	45.0	34.2	45.2	.2 low

NBS Thermometer #75C-530

Range- -1 to 201°C

Divisions- 0.2°



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## THERMOMETER CALIBRATION

AUGUST '88

<u>Thermometer #</u>	<u>Temp.</u>	<u>NBS</u>	<u>Deviation</u>
#8 (Nitrate Bath)	98.2	98.5	0.3 low
#1s( 100 ° oven)	99.0	98.5	0.5 high
#9 ( 180 ° oven)	101.0	98.5	2.5 high
Thermolyne Digital	97.2	98.5	1.3 low

NBS Thermometer #75C-530

Range -1 to 201° C

Divisions 0.2°

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February 10, 1989

SAMPLE BOTTLES PREPARATION

THE FOLLOWING PROCEDURES ARE TO BE USED IN THE PREPARATION AND PRESERVATION OF SAMPLING BOTTLES :

<u>TESTS</u>	<u>VOLUME</u>	<u>BOTTLE</u>	<u>PREP</u>	<u>PRES.</u>
COLOR	50 ml	G OR P	DET. WASH,	NONE. 4°C
CONDUCTIVITY	250 ml	G OR P	DI RINSE	"
HARDNESS	100 ml	G OR P	"	"
ODOR	200 ml	G OR P	"	"
PH	50 ml	G OR P	"	"
TSS	200 ml	G OR P	"	"
TS	200 ml	G OR P	"	"
TDS	200 ml	G OR P	"	"
TURBIDITY	100 ml	G OR P	"	"
CHLORIDE	100 ml	G OR P	"	"
FLUORIDE	100 ml	G OR P	"	"
PHOSPHOROUS	100 ml	G OR P	"	"
SULFATE	100 ml	G OR P	"	"
BOD <sub>5</sub>	100 ml	G OR P	"	"
ALL METALS	1 L	G OR P	DET. WASH, 1:1 HNO <sub>3</sub> , 1:1 HCL, DI RINSE	5 ml HNO <sub>3</sub> , 5 ml DI
CYANIDE	1 L	G OR P	DET. WASH, DI RINSE	NaOH, to pH > 12.0 (aprx. 4-5 pellets)
SULFIDE	125 ml	G OR P	DET. WASH, DI RINSE	2 ml Zn(Act.) NaOH to pH > 12.0

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PHENOL	1 L	G w/PTFE LINER	DET. WASH, DI RINSE	5 ml $\text{CuSO}_4$ , $\text{H}_3\text{PO}_4$ to pH 3.5 4 8°C
KJELDAHL -N	500 ml	G OR P	DET. WASH, DI RINSE	$\text{H}_2\text{SO}_4$ to pH <2 4 8°C
AMMONIA-N	500 ml	G OR P	"	"
NITRATE-N	50 ml	G OR P	"	"
NITRITE-N	50 ml	G OR P	"	"
COD	100 ml	G OR P	"	"
OIL & GREASE	1 L	SEP. G	"	"
TOC	25 ml	SEP. G	"	"
TOTAL ORG. HALOGEN(TOX)	500 ml or 1 1	G w/PTFE LINER OR FOIL	DET. WASH, DI RINSE, ACETONE RINSE BAKE 180°C	NONE 4°C
HERB/PEST	2 X 1 L	G w/PTFE LINER OR FOIL	DET. WASH, DI RINSE ACETONE RINSE HEXANE RINSE BAKE 180°C	NONE 4°C
TTHM	2 X 40 ml	G TUBE w/TEFLON	DET. WASH, DI RINSE, BAKE 180°C	2 DROPS 10% THIOSULFATE 4°C
VOC (WATER)	4 X 40 ml	G TUBE w/TEFLON	DET. WASH DI RINSE BAKE 180°C	2 DROPS 1:1 HCL 4°C
PCB(WATER)	1 L	G w/PTFE LINER OR FOIL	DET. WASH DI RINSE ACETONE RINSE HEXANE RINSE BAKE 180°C	NONE 4°C
PCB(OIL)	25 ml	G DISP. TUBE	NONE	NONE
EP-TOX	1 L	G OR P WIDE MOUTH	DET. WASH DI RINSE AIR DRY	NONE
SOIL	1 L	G OR P WIDE MOUTH OR COAL BAG	DET. WASH DI RINSE AIR DRY	NONE
OILS(ADD'N TEST)	500 ml- 1 L	G w/TEFLON	DET. WASH DI RINSE ACETONE RINSE HEXANE RINSE BAKE 180°C	NONE

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VOC(SOILS)	4 OZ	G w/TEFLON	DET. WASH DI RINSE ACETONE RINSE HEXANE RINSE BAKE 180°C	4 °C
CHLORINE (MUST BE DONE ON SITE)	-	-	-	-
DISSOLVED OXYGEN (MUST BE DONE ON SITE)	-	-	-	-
BACTERIA SAMPLES				
WATER	1	STERILE BAG OR BOT. w/THIOSULF.	-	4°C, 36hr.
SOIL, FOOD	1	STERILE BAG WHITE BAG OR COAL BAG OR SPECIMEN BOTL.	-	4°C, 36hr.

NOTE: FOR ALL ANALYSES, SAMPLING EQUIPMENT MUST BE DECONTAMINATED TO AN EXTENT NOT TO ALTER THE SAMPLE MORE THAN THE ABOVE CLEANING PROCEDURES WOULD. USE APPROPRIARE "COMMON SENSE"

## SAMPLE PRESERVATION

Complete and unequivocal preservation of samples, either domestic sewage, industrial wastes, or natural waters, is a practical impossibility. Regardless of the nature of the sample, complete stability for every constituent can never be achieved. At best, preservation techniques can only retard the chemical and biological changes that inevitably continue after the sample is removed from the parent source. The changes that take place in a sample are either chemical or biological. In the former case, certain changes occur in the chemical structure of the constituents that are a function of physical conditions. Metal cations may precipitate as hydroxides or form complexes with other constituents; cations or anions may change valence states under certain reducing or oxidizing conditions; other constituents may dissolve or volatilize with the passage of time. Metal cations may also adsorb onto surfaces (glass, plastic, quartz, etc.), such as, iron and lead. Biological changes taking place in a sample may change the valence of an element or a radical to a different valence. Soluble constituents may be converted to organically bound materials in cell structures, or cell lysis may result in release of cellular material into solution. The well known nitrogen and phosphorus cycles are examples of biological influence on sample composition. Therefore, as a general rule, it is best to analyze the samples as soon as possible after collection. This is especially true when the analyte concentration is expected to be in the low  $\mu\text{g/l}$  range.

Methods of preservation are relatively limited and are intended generally to (1) retard biological action, (2) retard hydrolysis of chemical compounds and complexes, (3) reduce volatility of constituents, and (4) reduce absorption effects. Preservation methods are generally limited to pH control, chemical addition, refrigeration, and freezing.

The recommended preservative for various constituents is given in Table 1. These choices are based on the accompanying references and on information supplied by various Quality Assurance Coordinators. As more data become available, these recommended holding times will be adjusted to reflect new information. Other information provided in the table is an estimation of the volume of sample required for the analysis, the suggested type of container, and the maximum recommended holding times for samples properly preserved.

TABLE 1

RECOMMENDATION FOR SAMPLING AND PRESERVATION  
OF SAMPLES ACCORDING TO MEASUREMENT<sup>(1)</sup>

<u>Measurement</u>	<u>Vol. Req. (ml)</u>	<u>Container</u> <sup>2</sup>	<u>Preservative</u> <sup>3,4</sup>	<u>Holding Time</u> <sup>5</sup>
100 <u>Physical Properties</u>				
Color	50	P,G	Cool, 4°C	48 Hrs.
Conductance	100	P,G	Cool, 4°C	28 Days
Hardness	100	P,G	HNO <sub>3</sub> to pH < 2	6 Mos.
Odor	200	G only	Cool, 4°C	24 Hrs.
pH	25	P,G	None Req.	Analyze Immediately
Residue				
Filterable	100	P,G	Cool, 4°C	7 Days
Non-Filterable	100	P,G	Cool, 4°C	7 Days
Total	100	P,G	Cool, 4°C	7 Days
Volatile	100	P,G	Cool, 4°C	7 Days
Settleable Matter	1000	P,G	Cool, 4°C	48 Hrs.
Temperature	1000	P,G	None Req.	Analyze Immediately
Turbidity	100	P,G	Cool, 4°C	48 Hrs.
200 <u>Metals</u>				
Dissolved	200	P,G	Filter on site HNO <sub>3</sub> to pH < 2	6 Mos.
Suspended	200		Filter on site	6 Mos. <sup>(b)</sup>
Total	100	P,G	HNO <sub>3</sub> to pH < 2	6 Mos.

TABLE 1 (CONT)

<u>Measurement</u>	<u>Vol. Req. (ml)</u>	<u>Container<sup>2</sup></u>	<u>Preservative<sup>3,4</sup></u>	<u>Holding Time<sup>5</sup></u>
Chromium <sup>8</sup>	200	P,G	Cool, 4°C	24 Hrs.
Mercury Dissolved	100	P,G	Filter HNO <sub>3</sub> to pH < 2	28 Days
Total	100	P,G	HNO <sub>3</sub> to pH < 2	28 Days
300 <u>Inorganics, Non-Metallics</u>				
Acidity	100	P,G	Cool, 4°C	14 Days
Alkalinity	100	P,G	Cool, 4°C	14 Days
Bromide	100	P,G	None Req.	28 Days
Chloride	50	P,G	None Req.	28 Days
Chlorine	200	P,G	None Req.	Analyze Immediately
Cyanides	500	P,G	Cool, 4°C NaOH to pH > 12 0.6g ascorbic acid <sup>6</sup>	14 Days <sup>7</sup>
Fluoride	300	P,G	None Req.	28 Days
Iodide	100	P,G	Cool, 4°C	24 Hrs.
Nitrogen				
Ammonia	400	P,G	Cool, 4°C H <sub>2</sub> SO <sub>4</sub> to pH < 2	28 Days
Kjeldahl, Total	500	P,G	Cool, 4°C H <sub>2</sub> SO <sub>4</sub> to pH < 2	28 Days
Nitrate plus Nitrite	100	P,G	Cool, 4°C H <sub>2</sub> SO <sub>4</sub> to pH < 2	28 Days
Nitrate <sup>9</sup>	100	P,G	Cool, 4°C	48 Hrs.
Nitrite	50	P,G	Cool, 4°C	48 Hrs.

TABLE 1 (CONT)

<u>Measurement</u>	<u>Vol. Req. (ml)</u>	<u>Container<sup>2</sup></u>	<u>Preservative<sup>3,4</sup></u>	<u>Holding Time<sup>5</sup></u>
Dissolved Oxygen Probe	300	G bottle and top	None Req.	Analyze Immediately
Winkler	300	G bottle and top	Fix on site and store in dark	8 Hours
Phosphorus Ortho- phosphate, Dissolved	50	P,G	Filter on site Cool, 4°C	48 Hrs.
Hydrolyzable	50	P,G	Cool, 4°C H <sub>2</sub> SO <sub>4</sub> to pH < 2	28 Days
Total	50	P,G	Cool, 4°C H <sub>2</sub> SO <sub>4</sub> to pH < 2	28 Days
Total, Dissolved	50	P,G	Filter on site Cool, 4°C H <sub>2</sub> SO <sub>4</sub> to pH < 2	24 Hrs.
Silica	50	P only	Cool, 4°C	28 Days
Sulfate	50	P,G	Cool, 4°C	28 Days
Sulfide	500	P,G	Cool, 4°C add 2 ml zinc acetate plus NaOH to pH > 9	7 Days
Sulfite	50	P,G	None Req.	Analyze Immediately
400 <u>Organics</u>				
BOD	1000	P,G	Cool, 4°C	48 Hrs.
COD	50	P,G	Cool, 4°C H <sub>2</sub> SO <sub>4</sub> to pH < 2	28 Days
Oil & Grease	1000	G only	Cool, 4°C H <sub>2</sub> SO <sub>4</sub> to pH < 2	28 Days
Organic carbon	25	P,G	Cool, 4°C H <sub>2</sub> SO <sub>4</sub> or HCl to pH < 2	28 Days
<u>Phenolics</u>	500	G only	Cool, 4°C H <sub>2</sub> SO <sub>4</sub> to pH < 2	28 Days

May  
Store  
x

TABLE 1 (CONT)

<u>Measurement</u>	<u>Vol. Req. (ml)</u>	<u>Container<sup>2</sup></u>	<u>Preservative<sup>3,4</sup></u>	<u>Holding Time<sup>5</sup></u>
MBAS	250	P,G	Cool, 4°C	48 Hrs
NTA	50	P,G	Cool, 4°C	24 Hrs.

1. More specific instructions for preservation and sampling are found with each procedure as detailed in this manual. A general discussion on sampling water and industrial wastewater may be found in ASTM, Part 31, p. 72-82 (1976) Method D-3370.
2. Plastic (P) or Glass (G). For metals, polyethylene with a polypropylene cap (no liner) is preferred.
3. Sample preservation should be performed immediately upon sample collection. For composite samples each aliquot should be preserved at the time of collection. When use of an automated sampler makes it impossible to preserve each aliquot, then samples may be preserved by maintaining at 4°C until compositing and sample splitting is completed.
4. When any sample is to be shipped by common carrier or sent through the United States Mails, it must comply with the Department of Transportation Hazardous Materials Regulations (49 CFR Part 172). The person offering such material for transportation is responsible for ensuring such compliance. For the preservation requirements of Table 1, the Office of Hazardous Materials, Materials Transportation Bureau, Department of Transportation has determined that the Hazardous Materials Regulations do not apply to the following materials: Hydrochloric acid (HCl) in water solutions at concentrations of 0.04% by weight or less (pH about 1.96 or greater); Nitric acid (HNO<sub>3</sub>) in water solutions at concentrations of 0.15% by weight or less (pH about 1.62 or greater); Sulfuric acid (H<sub>2</sub>SO<sub>4</sub>) in water solutions at concentrations of 0.35% by weight or less (pH about 1.15 or greater); Sodium hydroxide (NaOH) in water solutions at concentrations of 0.080% by weight or less (pH about 12.30 or less).
5. Samples should be analyzed as soon as possible after collection. The times listed are the maximum times that samples may be held before analysis and still considered valid. Samples may be held for longer periods only if the permittee, or monitoring laboratory, has data on file to show that the specific types of sample under study are stable for the longer time, and has received a variance from the Regional Administrator. Some samples may not be stable for the maximum time period given in the table. A permittee, or monitoring laboratory, is obligated to hold the sample for a shorter time if knowledge exists to show this is necessary to maintain sample stability.
6. Should only be used in the presence of residual chlorine.

7. Maximum holding time is 24 hours when sulfide is present. Optionally, all samples may be tested with lead acetate paper before the pH adjustment in order to determine if sulfide is present. If sulfide is present, it can be removed by the addition of cadmium nitrate powder until a negative spot test is obtained. The sample is filtered and then NaOH is added to pH 12.
8. Samples should be filtered immediately on-site before adding preservative for dissolved metals.
9. For samples from non-chlorinated drinking water supplies conc.  $\text{H}_2\text{SO}_4$  should be added to lower sample pH to less than 2. The sample should be analyzed before 14 days.



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Schiller Division

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## Quality Control For Metal Analysis

Upon receiving a sample into the laboratory for metal analysis:

1. Date, place, time of sampling, sampling person and proper laboratory check-in numbers must appear on laboratory check-in sheets and sample container prior to the sample being brought into the chem. lab.

### 11. Assure proper sample container.

- a. If Schiller lab is doing the sampling for metals, glass or plastic containers rinsed first with 1:1 HNO<sub>3</sub>, tap water, 1:1 HCL, tap water and final rinsings with deionized water must be used to prevent contamination of the sample.

Refer to Section 6, Sampling Procedures EPA-600/2-80-018 January 1980.

- b. If sample has been collected by someone other than Schiller personnel, check first with sampling person to assure that properly cleaned containers have been used. If not, the sample must be rejected.

### 111. Assure Proper Preservation

Samples for metal analysis must be preserved with HNO<sub>3</sub> to pH <2 prior to delivery to the laboratory or upon receipt in the laboratory.

Refer to E2-2; EPA-430/1-80-006, April 1980.

## IV. Sample Set-Up

Use Class A Glassware

All glassware used must be properly acid washed. Refer to EPA-430/1-80-006.

- a. Dissolved Metals  
Follow EPA Atomic Absorption Methods 4.1.1.
- b. Suspended Metals  
Follow EPA Atomic Absorption Methods 4.1.2.

Set-Up a blank on millipore filter in addition to samples.

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C. Total Metals

Follow EPA Atomic Absorption Methods 4.1.3.

Use 5 ml HNO<sub>3</sub>.

Note: Modification of digestion procedure for Sb, As, Au, Hg, Pt, Se, Ag, Sn, Tl. Review individual method sheets for these elements, EPA Atomic Absorption Methods.

Note: If there is no mention by the customer as to which metal data is to be reported, a total metal analysis is to be run. Refer to Atomic Absorption Methods 4.1.3.

V. Sample Analysis - Methods for Epa Drinking Waters.

Arsenic: AA; hydride generation  
Ref. 1, Method 3000VII

Barium AA, Direct aspiration  
Ref. 2, Method 208.1

Cadmium AA, Direct aspiration  
Ref. 2, Method 213.1

Chromium AA, Direct aspiration  
Ref. 2 Method 218.1

Mercury AA, Cold vapor  
Ref. 1, Method 300VI

Lead AA, Direct aspiration  
Ref. 2, Method 239.1

Selenium AA, Hydride generation  
Ref. 1, Method 300VII

Silver AA, Direct aspiration  
Ref. 2, Method 272.1

Reference 1: Standard Methods for Examination of Water and Wastewater; 14th Ed.

Reference 2: Methods for the Analysis of waters and Wastes;  
EPA 600/4-79-020

VI. Quality Control

Scope: Quality control begins from the time the sample is received in the laboratory and continues until a finished report is sent to the customer. Each quality control check exists to ensure and guarantee that the results reported are accurate and valid. The following quality control steps must be taken.

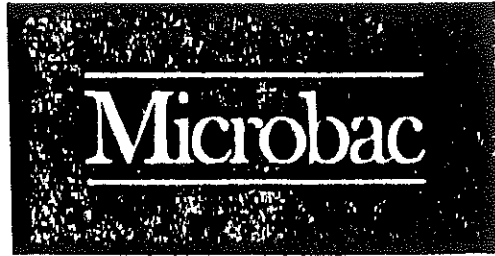
After a standard reagent curve composed of a minimum of a reagent blank and three standards has been prepared, subsequent standard curves must be verified by use of at least a reagent blank and one standard at or near the MCL. Daily checks must be within  $\pm 10\%$  of the original curve.

If 20 or more samples per day are analyzed, the working standard curve must be verified by running an additional standard at or near the MCL every 20 samples. Checks must be within  $\pm 10\%$  of the original curve.

For every 10 samples a duplicate sample must be run and agree within 15% error.

For every 20 samples a spike sample must be run and agree within 15% error.

Results falling outside these ranges indicate a problem that must be identified and corrected prior to rerunning of samples.



PAGE \_\_\_\_ OF \_\_\_\_

DATE RECEIVED: \_\_\_\_\_

CHAIN OF CUSTODY

CLIENT NAME: \_\_\_\_\_

ADDRESS: \_\_\_\_\_

SAMPLER: \_\_\_\_\_

DATE: \_\_\_\_\_

CONTACT PHONE NO.: \_\_\_\_\_

CLIENT SAMPLE ID'S

LAB ID'S

CLIENT SAMPLE ID'S

LAB ID'S

_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

I have received these samples from above sampler:

(1) Name: \_\_\_\_\_ Company: \_\_\_\_\_

Date: \_\_\_\_\_ Signature: \_\_\_\_\_

Time: \_\_\_\_\_

I have received these samples from above person:

(2) Name: \_\_\_\_\_ Company: \_\_\_\_\_

Date: \_\_\_\_\_ Signature: \_\_\_\_\_

Time: \_\_\_\_\_

EXHIBIT F.

MORITZ, INC.  
Results of Lab analyses  
Moritz, Inc. samples.  
(Wadsworth/Alert Laboratories)



WADSWORTH/ALERT  
LABORATORIES, INC.  
Sampling, testing, mobile labs

4101 Shuffel Drive N.W. / North Canton, Ohio 44720

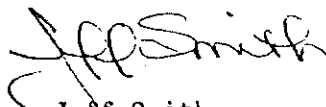
ANALYTICAL REPORT

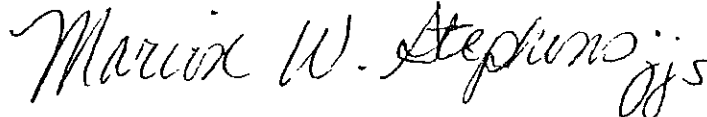
Presented to :

C. LOWE II/H. COX

7-7 INC.

WADSWORTH/ALERT LABORATORIES, INC.

  
Jeff Smith  
Project Manager

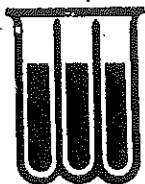


Marvin W. Stephens, Ph.D.  
Vice President & Corporate Technical Director

June 10, 1988



CORPORATE AND LABORATORY: North Canton, Ohio (216) 497-9396  
LABORATORY: Cleveland, Ohio (216) 642-9151  
LABORATORY: Bartow, Florida (813) 533-2150  
SOUTHEAST REGIONAL OFFICE: Lexington, South Carolina (803) 957-6590  
24-HOUR ALERT LINE: (216) 497-9338



WADSWORTH/ALERT  
LABORATORIES, INC.

COMPANY: 7-7 INC.

LAB #: 6143-60234

MATRIX: SOLID

DATE RECEIVED: 5/18/88

DATE EXTRACTED: 5/26/88

DATE ANALYZED: 5/27/88

SAMPLE ID: #3002 "MORITZ, INC. CONTAMINATED SOIL CLEAN-UP"

VOLATILE ORGANICS  
METHOD 8010/8020 - GC

Benzene	ND	1,2-Dichloroethane	ND
Bromodichloromethane	ND	1,1-Dichloroethylene	ND
Bromoform	ND	trans-1,2-Dichloroethylene	ND
Bromomethane	ND	Dichloromethane	ND
Carbon tetrachloride	ND	1,2-Dichloropropane	ND
Chlorobenzene	ND	1,3-Dichloropropylene	ND
Chloroethane	ND	Ethylbenzene	ND
Chloroform	ND	1,1,2,2-Tetrachloroethane	ND
2-Chloroethyl vinyl ether	ND	Tetrachloroethylene	ND
Chloromethane	ND	Toluene	ND
Chloromethyl methyl ether	--	1,1,1-Trichloroethane	ND
Dibromochloromethane	ND	1,1,2-Trichloroethane	ND
1,2-Dichlorobenzene	ND	Trichloroethylene	ND
1,3-Dichlorobenzene	ND	Trichlorofluoromethane	ND
1,4-Dichlorobenzene	ND	Vinyl chloride	ND
Dichlorodifluoromethane	ND	Xylenes	96
1,1-Dichloroethane	ND		

NOTE: ND (None Detected, lower detectable limit = 10 mg/kg ) as rec'd  
ND\* (None Detected, lower detectable limit = mg/kg ) as rec'd  
-- (Not Analyzed)



WADSWORTH/ALERT  
LABORATORIES, INC.

COMPANY : 7-7 INC.  
LAB #: 6143-60234  
MATRIX: SOLID

DATE RECEIVED: 5/18/88  
DATE EXTRACTED: 5/19/88  
DATE ANALYZED: 5/26/88

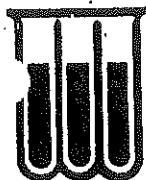
SAMPLE ID: #3002 "MORITZ, INC. CONTAMINATED SOIL CLEAN-UP"

POLYCHLORINATED BIPHENYLS  
METHOD 8080 LIST - GC

---

PCB-1016	ND
PCB-1221	ND
PCB-1232	ND
PCB-1242	ND
PCB-1248	ND
PCB-1254	ND
PCB-1260	ND
PCB-1262	--

NOTE: ND (None Detected, lower detectable limit = 1 mg/kg) as rec'd  
ND\* (None Detected, lower detectable limit = mg/kg) as rec'd  
-- (Not Analyzed)



WADSWORTH/ALERT  
LABORATORIES, INC.

COMPANY : 7-7 INC.

LAB #: 6143-60234

MATRIX : SOLID

DATE RECEIVED: 5/18/88

SAMPLE ID : #3002 "MORITZ, INC. CONTAMINATED SOIL CLEAN-UP"

**METALS ANALYTICAL REPORT  
SELECTED LIST**

Leachate testing in accordance with USEPA Manual SW846 Method 1310

EP EXTRACTION DATE: 5/27/88

ELEMENT	PREPARATION - ANALYSIS DATE	RESULT	DETECTION LIMIT
Silver	5/27- 5/31/88	ND	0.01 mg/l
Arsenic	5/27- 5/31/88	ND	0.005 mg/l
Barium	5/27- 6/ 1/88	1.7	0.01 mg/l
Cadmium	5/27- 5/31/88	0.03	0.01 mg/l
Chromium	5/27- 5/31/88	0.07	0.02 mg/l
Hexavalent Chrome	5/27- 6/ 1/88	ND	0.02 mg/l
Mercury	5/27- 5/31/88	ND	0.005 mg/l
Lead	5/27- 5/31/88	0.42	0.05 mg/l
Selenium	5/27- 5/31/88	ND	mg/l
Final pH	5/25- 5/26/88	4.8	su
Initial pH	5/25/88	5.6	su

NOTE: ND (None Detected)



WADSWORTH/ALERT  
LABORATORIES, INC.

COMPANY : 7-7 INC.  
LAB #: 6143-60234  
MATRIX : SOLID

DATE RECEIVED: 5/18/88

SAMPLE ID : #3002 "MORITZ, INC. CONTAMINATED SOIL CLEAN-UP"

# ANALYTICAL REPORT

---

PARAMETER	PREPARATION - ANALYSIS DATE	RESULT	DETECTION LIMIT
Cyanide	5/24/88	2.4	0.5 mg/kg
Density	5/25/88	1.02	
Flash Point	5/23/88	>140	deg F
pH	5/21/88	6.0	su
Sulfide	5/20/88	80	50 mg/kg

NOTE: ND (None Detected)



State of Ohio Environmental Protection Agency

Box 1049, 1800 WaterMark Dr.  
Columbus, Ohio 43266-0149  
(614) 644-3020  
FAX (614) 644-2329

*Already inputted TS*

TRACKING - UNKNOWN, CMES  
TO GO ON: ☒ RCRIS ☐ FO LOG ☐ USEPA LOG ☐ CJ LOG ☐ FILE  
ENTERED: ☒ RCRIS ☐ FO LOG ☐ USEPA LOG ☐ CJ LOG ☐ ONLY  
RCRIS ENTRY CODES: (EVALUATION) \_\_\_\_\_ (ENFORCEMENT) \_\_\_\_\_  
CEI ☐ CI ☐ OTHER ☒ INITIAL NOV ☐ FOLLOW-UP NOV ☐  
FULL RTC ☐ PARTIAL RTC ☐ LDR ☐ SENT TO USEPA: YES ☐ NO ☐

GOVERNOR  
Donald R. Schregardus  
Director

September 16, 1993

Re: **Moritz, Inc.**  
**OHD982218489**  
**Financial Assurance**

Denver Roof  
777 West Southern Avenue  
Suite 307  
Mesa, Arizona 85210

Dear Mr. Roof:

It is alleged that the Moritz facility placed paintwaste, waste solvents and other unknown materials into and onto the ground, dumpsters and other unknown locations at the facility. The known disposal area has dimensions of approximately 100 by 125 feet. Results of sample analysis taken during a May 7, 1987 investigation indicated soil contamination from xylene, toluene, naptha, mineral spirits and lead.

This unpermitted disposal practice of hazardous waste at Moritz, Inc. requires te facility to comply with Interim Status Status. Therefore, Moritz, Inc. must demonstrate compliance with financial assurance rules and liability requirements as specified in Ohio Administrative Code (OAC) rules 3745-66-42 through 3745-66-47.

On March 7, 1991 Ohio EPA conducted a review of the financial assurance and liability coverage documentation on file for the Moritz, Inc. facility. The facility waas cited in violation of OAC rules 3745-66-43, 3745-66-45 and 3745-66-47 in the March 11, 1993 Notice of Violation (NOV) letter. To date, Ohio EPA has not received a response to these financial assurance violations.

On November 18, 1992, Ohio EPA conducted a review of financial assurance documentatin on file. The facility was evaluated for compliance with the cost estimate, financial assurance for clsoure and post-closure care, and liability coverage requirements of OAC rules 3745-66-42 through 3745-66-45 and 3745-66-47. Review of the financial assurance documentation revealed, Moritz, Inc. remains in violation of OAC rules 3745-66-43, 3745-66-45 and 3745-66-47.



Printed on recycled paper

Denver Roof  
September 16, 1993  
Page Two

Ohio EPA requested in the March 11, 1991 NOV letter that Moritz, Inc. submit additional documentation itemizing specific third party costs that would be associated with each phase of the closure and post-closure activities. Moritz, Inc. has not responded to the request for detailed closure and post-closure activities. Even though cost estimates were included in the closure plan which was submitted to Ohio EPA on November 8, 1990, the owner or operator must maintain a detailed, written estimate for closure and post-closure cost activities. Therefore, Moritz, Inc. is in violation of OAC rules 3745-66-42 and 3745-66-44.

To demonstrate abatement of these violations, please submit the appropriate documentation (i.e., a mechanism to demonstrate closure/post-closure financial assurance, liability coverage and detailed closure/post-closure cost estimates) within thirty (30) days of receipt of this letter.

If you should have any questions concerning financial assurance requirements, please call me at (614)644-2934.

Sincerely,



Tina Jennings  
Compliance Monitoring and Enforcement Section  
Division of Hazardous Waste Management

wp.TJ.len.moritz

cc: Don North, DHWM, NWDO  
Laurie Stevenson, CM&ES, DHWM  
Nyall McKenna, CM&ES, DHWM  
Chris Korleski, AGO/EES

GAEL  
LDF  
FAD



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.  
Columbus, Ohio 43266-0149  
(614) 644-3020  
FAX (614) 644-2329

George V. Voinovich  
Governor

March 11, 1991

Re: Moritz Inc.  
OHD982218489  
Financial Assurance

Mr. Jim Boyd  
Moritz, Inc.  
400 Park Avenue East  
Mansfield, OH 44905

Dear Mr. Boyd:

On March 7, 1991 Ohio EPA conducted a review of the financial assurance and liability coverage documentation on file for the Moritz, Inc. facility referenced above. The facility was evaluated for compliance with the cost estimate, financial assurance for closure and post-closure care, and liability coverage requirements of Ohio Administrative Code (OAC) rules 3745-66-42 through 3745-66-45 and 3745-66-47.

File information indicates that Moritz, Inc., has failed to establish financial assurance for closure and post-closure care, in violation of OAC rules 3745-66-43 and 3745-66-45, and to establish liability coverage, in violation of OAC rule 3745-66-47.

Ohio EPA is in receipt of the facility's cost estimate for closure (\$628,000) and post-closure (\$15,000) activities, obtained from the revised closure plan which was submitted on November 8, 1990. To confirm that these estimates meet the requirements of OAC rules 3745-66-42 and 3745-66-44, it is requested that the facility submit additional documentation, itemizing the specific third party costs that would be associated with each phase of the closure and post-closure activities (i.e. soil excavation, off-site disposal costs, equipment costs, decontamination efforts, etc.).

OAC rules 3745-66-42 and 3745-66-44 also require that upon establishment of a financial assurance mechanism in accordance with OAC rules 3745-66-43 and 3745-66-45, the cost estimates for closure and post closure must be updated to account for inflation within (60) days from the anniversary date of the establishment of the mechanism(s). The cost estimate must also be updated in the event that a revision to the closure plan results in an increase in the cost of closure. This update must be made within (30) days after such a revision.

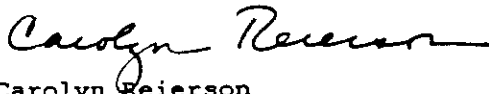


Mr. Jim Boyd  
Moritz, Inc.  
March 11, 1991  
Page Two

It is noted that the financial assurance violations cited above, in addition to other violations of Ohio's hazardous waste laws and regulations, are currently before Ohio's Office of the Attorney General and must be addressed by Moritz, Inc. accordingly.

If you have any questions, please call me at (614) 644-2934.

Sincerely,



Carolyn Reiersen  
Hazardous Waste Enforcement Section  
Division of Solid & Hazardous Waste Management

LS/CR/lcn

cc: Don North, DSHWM, NWDO  
Laurie Stevenson, Supervisor, HWES, DSHWM  
Jim Kaminski, HWES, DSHWM  
Phil Haffenden, Office of the Attorney General  
Chris Korleski, Office of the Attorney General

# inter-office communication

to: Moritz, Inc., Financial Assurance File date: 3/20/89  
from: Carolyn Referson, RCRA Enforcement Section, DSHWM  
subject: Financial Record Review - Moritz, Inc., NWDO - OHD982218489

On March 16, 1989, I evaluated Moritz, Inc. for compliance with the financial responsibility requirements of Ohio Administrative Code (OAC) rules 3745-66-42 through 3745-66-47. My review revealed that the facility has not provided Ohio EPA with documentation of compliance, and, therefore, is in violation of these rules.

Moritz, Inc. has been notified of its violation of OAC rules 3745-66-42 and 43 in a complaint filed by the Attorney General's Office on October 4, 1988. Because of this ongoing enforcement action, no additional notice will be provided to the facility by Ohio EPA at this time.

CR/drr  
1829S/56

cc: Dave Sholtis, DSHWM  
Chuck Hull, NWDO  
Lauren Alterman, AGO



**C.2 Compliance/  
Enforcement**





State of Ohio Environmental Protection Agency

**Northwest District Office**

347 North Dunbridge Road  
P.O. Box 466  
Bowling Green, Ohio 43402-0466  
(419) 352-8461 FAX (419) 352-8468

George V. Voinovich  
Governor

Re: Moritz, Inc.  
Hazardous Waste  
Richland County  
Partial RTC

**RECEIVED**

OCT 2 1991

OFFICE OF RCRA  
Waste Management Division  
U.S. EPA, REGION V

October 4, 1991

Mr: Jim Boyd  
Moritz, Incorporated  
400 Park Avenue East  
Mansfield, Ohio 44905

Dear Mr. Boyd:

The Ohio EPA has reviewed your letters dated February 7 and 12, 1991 and the Waste Analysis Plan, the Inspection Plan, the Personnel Training Program, the Contingency Plan, and the Operating Recordkeeping Plan. This Agency has the following comments which correspond to the Notice of Violation dated January 10, 1991:

Paragraph B. Moritz, Inc. must still provide a copy of each hazardous waste manifest generated as a result of the off-site transportation of the 17 drums of hazardous waste mentioned in paragraph B. Please carefully note that the waste was in storage for greater than 180 days. Furthermore, the Ohio EPA is greatly disturbed to learn that this waste remained in storage unlabeled and unknown until September 21, 1990, according to your letter dated February 7, 1991.

As indicated in the January 10, 1991 NOV, Moritz, Inc. must submit a closure plan for the waste solvent storage areas and the waste dried paint storage areas mentioned in paragraphs A, B and C within 45 days. The closure plan must include all applicable requirements of OAC Rules 3745-66-10 through 3745-66-20. Three copies of the closure plan must be submitted to the Director of the Ohio EPA at P.O. Box 1049, Columbus, Ohio, 43266-0149.

1. OAC Rule 3745-52-34(D) (5) (b) You provided a copy of the information that has been posted by the telephone, in a letter dated February 12, 1991. The information is suitable for meeting the requirements of this rule. Placement of this information by the telephone will be verified during a future inspection.



Mr. Jim Boyd  
October 4, 1991  
Page Two

2. OAC 3745-65-13 You submitted a copy of the Moritz Waste Plan dated March 11, 1991. This agency has reviewed the plan and has the following comments:

- a. The Waste Analysis Plan must be revised to indicate that the floor sweepings will be collected each day and placed in a sealed and labeled container.
- b. The General Description of Wastes must be revised to indicate the Ohio EPA Hazardous Waste Number for each hazardous waste.
- c. The plan must be revised to describe waste liquid paint.
- d. The plan's general description must be revised to describe what is done with spent xylene.
- e. The plan must be revised to describe specifically which wastes will be sampled with a COLIWASA or similar liquid sampling device.
- f. The plan must be revised to indicate who will perform the sampling activities.
- g. The plan must be revised to describe specifically which wastes will be sampled with a grain sampler or equivalent device.
- h. The Waste Analysis Plan must list the laboratories that are considered for performing waste analysis.
- j. The plan must be revised to include solvent TCLP analysis for hazardous wastes.
- k. Page 11 of the plan should be revised to state that the "results of the TCLP analyses will be included..."
- l. The plan must be revised to clearly indicate that the waste xylene will be assigned the Hazardous Waste Number F003 if before use the mixture contains a total of ten percent or more (by volume) of the listed waste, not after use.
- m. The Waste Analysis Plan must be revised to indicate that subsequent analyses will be performed for each metal that was 85% of the Maximum Concentration in OAC Rule 3745-51-24.

Mr. Jim Boyd  
October 4, 1991  
Page Three

- n. The plan must be revised to describe the Land Disposal Restriction Notice that will be provided with each hazardous waste shipment. Include examples of each notice.
- 
- 2. OAC Rule 3745-65-15 You submitted a copy of the Moritz Inspection Plan dated May 1991. This Agency has reviewed the plan and has found the plan complete. This violation has been corrected.
  - 3. OAC Rule 3745-65-16 You submitted a copy of the Personnel Training Program dated June 1991. This Agency has reviewed the program and has the following comments:
    - a. The outline of the training program must be revised to distinguish between the introductory and the continuing training program and a brief description must be provided on how training will address actual job tasks.
    - b. The program must be revised to indicate that an annual review of the training program is conducted. Also, the Personnel Training Program must be revised to describe the content, frequency, and techniques used in both introductory and continuing training.
    - c. The program must be revised to demonstrate that the program is directed by a person trained in hazardous waste management and job descriptions must be provided for employees working with hazardous waste.
    - d. The program must be revised to indicate that training has been successfully completed by facility personnel within 6 months of their employment or assignment to the facility or transfer to a new position within the facility.
  - 4. OAC Rule 3745-65-51 You submitted a copy of the Moritz Contingency Plan dated June, 1991. This Agency has reviewed the plan and has the following comments:
    - a. The plan must be revised to include procedure for identification of hazardous materials involved in an emergency, which includes but is not limited to: character, exact source, amount and areal extent of any released materials.
    - b. The plan must be revised to describe specifically the control procedures to be taken in the event of fire, explosion or release.

Mr. Jim Boyd  
October 4, 1991  
Page Four

- c. The Contingency Plan must be revised to describe the necessary steps to be taken to ensure that fires, explosions, or releases do not occur, reoccur, or spread to other areas until clean-up procedures are complete.
  - d. The plan must be revised to provide for treatment, storage, or disposal of any material that results from a release, fire, or explosion at the facility.
  - e. The plan must describe provisions for prevention of incompatible waste from being treated, stored, or located in the affected emergency areas until clean-up procedures are completed.
  - f. The plan must be revised to include specifically the post-emergency equipment maintenance procedures to ensure the equipment is cleaned and fit for its intended use.
  - g. The plan must be revised to specify procedures to be used when responding to container spills or leakage, including procedures and timing for expeditious removal of spilled waste and repair or replacement of the containers.
  - h. The plan must be revised to describe specifically the coordination agreements with local police and fire departments, hospitals, contractors, and state and local emergency response teams to familiarize them with the facility and actions needed in case of emergency.
  - i. The Contingency Plan must include specific information on the routes, and signals used to evacuate the facility.
  - j. The plan must be revised to describe the provisions for submission of emergency incidents within 15 days of occurrence of records identifying the time, date, and details of an emergency incident.
5. OAC 3745-65-73 You submitted the Operating Recordkeeping Plan on July 1991. The Agency has reviewed the plan and found it to be complete. This violation has been corrected.

Mr. Jim Boyd  
October 4, 1991  
Page Five

Please respond, in writing, to this Notice of Violation (NOV) within 10 days. Your response must conform to the requirements in this NOV and must be sufficient to correct all noted deficiencies in the above plans.

Failure to list specific deficiencies in this NOV does not relieve you from the responsibility of complying with all applicable hazardous waste regulations.

If you have any questions, please contact me immediately.

Sincerely,



Jerry Parker  
Division of Hazardous Waste Management

/rab

pc: Chris Korleski, AGO  
Laurie Stevenson, DSHWM, CO  
Jeff Mayhugh, DSHWM, CO  
Phil Williams, DSHWM, NWDO  
Don North, DSHWM, NWDO  
Cindy Lohrbach, DSHWM, NWDO  
A & C Representative  
NWDO File





State of Ohio Environmental Protection Agency

**Northwest District Office**

347 North Dunbridge Road  
P.O. Box 466  
Bowling Green, Ohio 43402-0466  
(419) 352-8461 FAX (419) 352-8468

TRACKING - UHWM, CM&ES  
TO GO ON: ☒ RCRIS ☐ DBASE ☐ FO LOG ☐ USEPA LOG ☐ CJ LOG  
ENTERED: ☒ RCRIS ☐ DBASE ☐ FO LOG ☐ USEPA LOG ☐ CJ LOG  
RCRIS ENTRY CODES: (EVALUATION) 011 (ENFORCEMENT) 013  
CEI ☒ CI ☐ OTHER ☐ INITIAL NOV ☐ FOLLOW-UP NOV ☐  
FULL RTC ☐ PRTL RTC ☐ TCLP ☐ LDR ☒ SENT TO USEPA: YES ☐ NO ☐

RECEIVED MAY 17 1993  
WMD RCRA  
RECORD CENTER *Hard Copy*

George V. Voinovich  
Governor

Re: Moritz Incorporated  
OHD 982218489  
Hazardous Waste  
Richland County

October 23, 1992

Mr. Frank Moritz  
Owner/Operator  
Moritz Incorporated  
400 Park Avenue East  
Mansfield, Ohio 44905

RECEIVED  
OHIO EPA  
OCT 26 1992  
DIV. OF HAZARDOUS WASTE MGT.

Dear Mr. Moritz:

On October 14, 1992, the Ohio Environmental Protection Agency (Ohio EPA) conducted a hazardous waste compliance evaluation inspection at Moritz Incorporated located in Mansfield, Ohio. This inspection was conducted to determine Moritz's compliance with Ohio's generator regulations as adopted under Chapter 3745 of the Ohio Administrative Code (OAC). Moritz Incorporated was represented by Bob Wingler and yourself. The Ohio EPA was represented by Phil Williams and the writer. The Agency's inspection included a tour of the facility and a review of written documentation.

Moritz Incorporated assembles and paints livestock trailers. Hazardous waste streams generated at the facility include spent xylene F003/D001 and paint waste D001/D008.

During the inspection, the following violations of Ohio's hazardous waste rules were observed and noted:

1. OAC Rule 3745-52-11 Moritz Incorporated has not thoroughly evaluated its wastes to determine if they exhibit any hazardous characteristics or contain hazardous waste constituents.

At the time of the inspection, Moritz Incorporated had swept the floor sweepings out of the painting booth into a pile in the room located behind the painting booth. The facility has traditionally managed this waste stream as D001/D008 hazardous waste; however, you stated that all of the paint used at the facility was lead free. On March 27, 1992, the facility submitted a waste analysis plan to this office. The analytical data provided in the plan documents that the floor sweepings have a flashpoint greater than 200 degrees Fahrenheit and Toxicity Characteristic Leaching Procedure



Mr. Frank Moritz  
October 23, 1992  
Page Two

(TCLP) lead content of .63 mg/l. This analytical data suggests that this waste stream is nonhazardous, however, the facility shipped this waste stream off-site on August 6, 1992, as a D001/D008 hazardous waste. Therefore, Moritz Incorporated must reevaluate the paint waste (filters and overspray) for RCRA heavy metal content by using either generator knowledge or analytical data. If the facility uses generator knowledge to determine the regulatory status of the paint waste, Material Safety Data Sheets for the paints used at the facility during the last six months must be submitted to this office. Until this waste stream is adequately characterized, the paint waste must be contained in a closed drum or container.

The waste analysis plan submitted to this office on March 27, 1992, documents that the xylene paint waste contains TCLP lead levels of 36.2 mg/l. The facility has been shipping this hazardous waste off-site incorrectly as an F003/D001 hazardous waste. According to this analytical data, the xylene paint waste must be coded as F003/D001/D008 due to the lead content. Moritz Incorporated must reevaluate the xylene paint waste using either generator knowledge or analytical data to determine if the xylene paint waste still exhibits a hazardous waste characteristic for lead.

Moritz Incorporated must evaluate the contents of the twelve 55-gallon containers generated during the installation of the facility's four monitoring wells in July of 1991. Seven containers are located beside the closure unit behind the facility, and other containers are in the general vicinity of the monitoring wells. This waste must be analyzed for organic constituents and RCRA heavy metal content. Analytical data must be submitted to this office within 45 days documenting the contents of these containers. These containers must be moved to the hazardous waste storage area until analytical data is submitted to this office documenting the regulatory status of the contents of these containers.

2. OAC Rule 3745-52-34 (C) Moritz Incorporated failed to label the satellite container accumulating spent xylene with the words "Hazardous Waste."

Moritz Incorporated corrected this violation at the time of the inspection by properly labeling the satellite accumulation drum with the words "Hazardous Waste."

Mr. Frank Moritz  
October 23, 1992  
Page Three

3. <sup>TSP-4</sup> OAC Rule 3745-65-15 (A) (1) (2) Moritz Incorporated must submit records demonstrating that weekly inspections are being performed at the facility looking for malfunctions, deterioration, operator error and discharges which may pose a threat to human health or the environment.

Moritz Incorporated must submit inspection records for the month of September 1992 to demonstrate compliance with this rule. This documentation must be submitted to this office within 30 days.

4. <sup>TSP-4</sup> OAC Rule 3745-65-17 Moritz Incorporated failed to place a "No Smoking" or "No Open Flame" sign in the area where spent xylene is accumulated.

Moritz Incorporated must place a "No Smoking" or "No Open Flame" sign in the room where waste xylene is accumulated. The facility must submit documentation (a picture) to this office demonstrating that such a sign has been placed in this area within 30 days.

5. OAC Rule 3745-65-33 Moritz Incorporated fails to test/inspect all facility communications or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment on a weekly basis to assure its proper operation.

Moritz Incorporated must immediately begin to test/inspect all emergency equipment on a weekly basis.

6. OAC Rule 3745-65-33 (B) Moritz Incorporated fails to record weekly emergency equipment test/inspections in a log. Inspection logs must include date and time of test, person conducting test, observations made, and date and nature of any repairs.

Moritz Incorporated must record weekly inspections in a log and retain them for at least three years from the time of the inspection. The facility must submit one month of completed emergency equipment inspection checklists or logs to this office within 45 days as documentation that the inspections are being conducted and recorded.

7. OAC Rule 3745-65-54 (D) Moritz Incorporated failed to revise the contingency plan to demonstrate that Frank Moritz is currently the primary emergency coordinator.

Moritz Incorporated must revise the contingency plan to show that you, Frank Moritz, are now the primary emergency coordinator. Names of employees listed as emergency coordinator who are no longer employed at the facility must be removed from the list of emergency coordinators. Moritz Incorporated must submit the revised list of emergency coordinators to this office within 30 days. Please note that the facility's primary emergency coordinator must be familiar with the emergency procedures to be taken during an emergency situation.

8. OAC Rule 3745-66-73 (A) Moritz Incorporated failed to keep the satellite accumulation drum of spent xylene closed.

This violation was corrected at the time of the inspection by replacing the bung. Moritz Incorporated must keep drums of hazardous waste closed except when it is necessary to add or remove waste. Moritz's compliance with this rule will be reconfirmed during the Agency's next on-site visit.

9. OAC Rule 3745-59-07 (A), 40 CFR 268.7 (a) Moritz Incorporated has failed to adequately evaluate all wastes generated at the facility to determine if the wastes are restricted from land disposal.

Moritz Incorporated must evaluate the paint waste and spent xylene for RCRA heavy metal content using either generator knowledge or analytical data as described in violation number 1 above.

Moritz Incorporated must also evaluate the contents of the twelve 55-gallon containers generated during the installation of the facility's four monitoring wells in July of 1991. This waste must be analyzed for organic constituents and RCRA heavy metal content. Analytical data must be submitted to this office within 45 days documenting the contents of these containers.

10. OAC Rule 3745-59-07 (A)(1), 40 CFR 268.7 (a)(1) Moritz Incorporated failed to provide a Land Disposal Restriction notification for manifest #91002.

Moritz Incorporated must contact the applicable Treatment/Storage/Disposal facility receiving this shipment of waste and obtain a copy of the completed LDR notification. This documentation must be submitted to this office within 30 days.

Mr. Frank Moritz  
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The following violations are from the Ohio EPA's inspection of Moritz Incorporated on October 23 and 29, 1990. The current status of these violations is outlined below.

11. OAC Rule 3745-52-34 (D)(5)(b) Moritz Incorporated does not post the following information by the telephone: name and telephone number of the emergency coordinator; location of fire extinguishers and spill control material and fire alarms.

Moritz Incorporated corrected this violation at the time of the October 14, 1992 inspection by posting the required information beside the telephone in the painting area.

12. OAC Rule 3745-65-13 Moritz Incorporated does not have a detailed chemical and physical analysis of all its waste material which contains all the information necessary to properly dispose of the waste. The facility also does not have a written waste analysis plan.

Moritz Incorporated submitted a waste analysis plan to this office on March 19, 1991, and a revised plan on March 27, 1992. A partial return to compliance (PRTC) was sent to your facility on June 19, 1992, stating that the waste analysis plan was deficient. Upon further review of the submitted waste analysis plan, it has been determined that Moritz Incorporated has sufficiently corrected this violation by submitting the revised waste analysis plan on March 27, 1992.

13. OAC Rule 3745-65-16 Moritz Incorporated failed to have a written personnel training program.

Moritz Incorporated submitted a written personnel training program to this office on June 25, 1991, and a revised plan on March 27, 1992. The revised personnel training program was adequate but no documentation was submitted demonstrating that facility personnel had received the appropriate training. During the October 14, 1992 inspection of the facility, the facility had written documentation (sign-in sheets) demonstrating that facility personnel have been adequately trained. Therefore, this violation has been corrected.

14. OAC Rule 3745-68-02 Moritz Incorporated fails to comply with the general operating requirements for a hazardous waste landfill including, but not limited to: run-on

Mr. Frank Moritz  
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control system; run-off management system; collection and holding facility management; and, cover or wind dispersal management.

This violation will remain outstanding until the hazardous waste landfill area is closed and certified in accordance with the approved closure plan.

15. OAC Rule 3745-59-07 and 40 CFR 268.7 Moritz Incorporated has failed to include the corresponding treatment standards and all applicable prohibitions in its notification to the treatment, storage, and disposal facility.

During the October 14, 1992 inspection, it was noted that manifest #91002 did not have the corresponding Land Disposal Restriction (LDR) notification attached. Moritz Incorporated must submit the applicable LDR notification to this office within 30 days.

At the time of this inspection, Moritz Incorporated did not have any confirmed hazardous waste in storage, therefore, OAC Rule 3745-66-74, which requires weekly inspections of hazardous waste storage areas, was not cited. In the future, when the facility has hazardous waste in storage, this storage area must be inspected at least on a weekly basis. Inspections must be made to determine if there is any evidence of leaks or corrosion. Records of these inspections must include: date and time of inspection; name of the inspector; notations and observations made during the inspection; and, the date and nature of any repairs or other remedial action. These inspection checksheets must be maintained for at least three years from the date of the inspection.

Moritz Incorporated must submit documentation to this office stating when the facility stopped using the still located in a bathroom at the facility, and document that the still was properly cleaned and the still bottoms were properly shipped off-site. This documentation must be submitted to this office within 30 days.

Please be advised that failure to comply with applicable hazardous waste rules may be cause for enforcement action by this Agency pursuant to Chapter 3734 of the Ohio Revised Code.

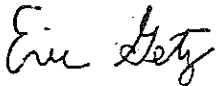
Please respond, in writing, to this Notice of Violation (NOV) within ten (10) days. Your response must include all actions and timetables necessary to demonstrate compliance.

Mr. Frank Moritz  
October 23, 1992  
Page Seven

Failure to list specific deficiencies in this communication does not relieve you from the responsibility of complying with all applicable regulations.

A copy of the completed inspection form is enclosed for your review. If you have any questions, please contact me at (419) 352-8461.

Sincerely,



Eric Getz  
Division of Hazardous Waste Management

/mtt

Enclosures

pc: Laurie Stevenson, DSHWM, CO  
A&C Representative  
Lori A. Massey, Assistant Attorney General, EE Section  
Nyall McKenna, DHWM, CO  
Cindy Lohrbach, DHWM, NWDO  
NWDO file



RCRA HAZARDOUS WASTE GENERATOR  
COMPLIANCE EVALUATION INSPECTION CHECKLIST

Facility: Moritz Incorporated  
USEPA I.D.: OH 982 218 489  
Street: 400 Park Ave.  
City: Mansfield, State: OH Zip: 44905  
County: Richland Telephone: \_\_\_\_\_  
Owner/Operator: \_\_\_\_\_  
Street: \_\_\_\_\_  
City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_  
Telephone: \_\_\_\_\_ Fax: \_\_\_\_\_  
Inspection Date: 10 / 14 / 92 Time: \_\_\_\_\_  
Advance notice of inspection given? (yes) \_\_\_\_\_ (no) ✓  
If so, how far in advance? \_\_\_\_\_

	<u>Name</u>	<u>Agency/Title</u>	<u>Phone</u>
Inspectors:	<u>Phil Williams</u>	<u>OEPA</u>	<u>(419) 352-8461</u>
	<u>Eric Getz</u>	<u>OEPA</u>	<u>(419) 352-8461</u>
Facility Representative:	<u>Frank Moritz</u>	<u>Owner</u>	_____

STATUS

Cond. Exempt SQG \_\_\_\_\_ SQG ✓ Large Quantity Generator \_\_\_\_\_  
LDR Checklist Attached: (yes) \_\_\_\_\_ (no) \_\_\_\_\_

NOTE: LDR requirements are not applicable to CRSQGs.

ACTIVITIES

Containers <u>✓</u>	Used oil burner _____
Tanks _____	Hazardous waste fuel burner/blender _____
Wastepile _____	Incineration/Thermal treatment _____
Landfill _____	Land treatment _____
Surface Impoundment _____	Groundwater monitoring _____

REMARKS - GENERAL INFORMATION

Include list of wastes being generated/managed at the site and a brief description of site activity and waste handling procedures:

Moritz Inc. assembles and paints livestock trailers.

Hazardous Waste generated at this facility includes:  
Spent Xylene and floor sweeping from the paint room.

According to submitted analytical data the Spent Xylene is an F003, D001, D008 hazardous waste, however, this waste is currently shipped off-site as an F003, D001 hazardous waste. The floor sweepings are being managed as D001, D008 hazardous waste. Submitted analytical data suggests that this waste stream is non-hazardous.

Moritz Inc. is currently an illegal disposal facility due to past disposal of hazardous waste on the property. The facility received a closure plan approval on April 26, 1991 but as of yet the facility has not begun closure of the landfill area.

# OFF SITE MANAGEMENT

[illegible]

GENERATOR CLASSIFICATION (OAC 3745-52-34)

Does the facility:

1. Generate < 100 Kg (25-30 gallons) of hazardous waste in a calendar month?

(yes) \_\_\_\_\_ (no) \_\_\_\_\_

If so, the facility is classified as a Conditionally Exempt Small Quantity Generator, unless 3.b. applies. Please complete the Conditionally Exempt Small Quantity Generator Requirements checklist.

2. Generate between 100 and 1000 Kg of hazardous waste in a calendar month? (about 25 to under 300 gallons)

(yes) ✓ (no) \_\_\_\_\_

If so, the facility is classified as a Small Quantity Generator, unless 3.b. applies. Please stop here and complete the Small Quantity Generator Requirements checklist.

3. a. Generate > 1000 Kg (~ 300 gallons) of hazardous waste in a calendar month?

(yes) \_\_\_\_\_ (no) \_\_\_\_\_

or;

- b. Generate > 1 Kg of acutely hazardous waste in a calendar month?

(yes) \_\_\_\_\_ (no) \_\_\_\_\_

If so, the facility is classified as a Large Quantity Generator. Please complete the Large Quantity Generator Requirements checklist.

REMARKS - GENERATOR CLASSIFICATION

SATELLITE ACCUMULATION AREA REQUIREMENTS  
(OAC 3745-52-34(C))

Y/N/NA RMK #

1. Has the facility elected to accumulate hazardous waste at or near a point of generation which is under the control of the operator of the process generating the waste? (defined as satellite accumulation)

Y \_\_\_\_\_

If so, are the following requirements of OAC 3745-52-34(C) being met:

- a. Quantities of waste accumulated do not exceed 55 gallons at any time?
- b. Quantities of acutely hazardous waste accumulated do not exceed 1 quart at any one time?
- c. The generator has marked the containers with words "Hazardous Waste" or with other words identifying the contents of the container?

Y \_\_\_\_\_

Y \_\_\_\_\_

N 1 \_\_\_\_\_

If the facility is maintaining satellite accumulation areas as identified in 1.a. and 1.b. above, OAC 3745-52-34(C) also requires that the container(s) in these areas be managed in compliance with the "Container Management" requirements of OAC 3745-66-71, 3745-66-72, 3745-66-73(A), 3745-66-76 and 3745-66-77. Please complete the Use and Management of Containers checklist to document compliance with these requirements.

2. Is the facility accumulating hazardous waste(s) in excess of the amounts listed in either 1.a or 1.b?

N \_\_\_\_\_

- a. If so, did the generator comply with 3745-52-34(A) within three (3) days? and;

NA \_\_\_\_\_

- b. Upon accumulating > 55-gallons of waste, did the generator mark the container holding the excess hazardous waste with the date the excess began accumulating?

NA \_\_\_\_\_

REMARKS - SATELLITE ACCUMULATION REQUIREMENTS

*1) Corrected at the time of the inspection*

SPECIAL REQUIREMENTS FOR IGNITABLE/REACTIVE/INCOMPATIBLE  
WASTES (OAC 3745-65-17)

Y/N/NA RMK #

NOTE: The following requirements are generally applicable to TSD facilities only. See OAC Rule 3745-66-992(F)(2) for applicability of ignitable/reactive/incompatible waste requirements for SQGs accumulating hazardous waste in tanks.

1. If ignitable, reactive or incompatible wastes are handled, does the facility meet the following requirements?  
[3745-65-17]

a. Wastes are protected from sources of ignition and/or reaction?

Y \_\_\_\_\_

b. Physical separation of incompatible waste materials?

NA \_\_\_\_\_

c. "No Smoking" or "No Open Flames" signs are placed near areas where ignitable or reactive wastes are handled?

N \_\_\_\_\_

d. Commingling of waste materials is done in a controlled, safe manner as prescribed by 3745-65-17(B)?

NA \_\_\_\_\_

REMARKS - IGNITABLE/REACTIVE/INCOMPATIBLE WASTE REQUIREMENTS

PREPAREDNESS AND PREVENTION (OAC 3745-65-30 TO 3745-65-37)

Y/N/NA RMK #

1. Is the facility operated to minimize the possibility of fire, explosion, or non-planned release of hazardous waste? [3745-65-31] Y
2. Has there been a fire, explosion or non-planned release of waste at the facility since date of last inspection? N
  - a. If yes, was the contingency plan implemented? [3745-65-51(B)] NA

NOTE: Small quantity generators are not required to maintain a contingency plan. Question #2(a) is, therefore, not applicable to SQGs.

3. If required due to actual hazards associated with the waste, does the facility have the following equipment: [3745-65-32 (A) (B) (C) (D)]
  - a. Internal alarm system? Y
  - b. Access to telephone, radio or other device for summoning emergency assistance? Y
  - c. Portable fire control equipment, spill control and decontamination equipment? Y
  - d. Water of adequate volume and pressure via hoses, sprinkler, foamers or sprayers? Y
4. Is all required spill control and decontamination equipment, fire and communications equipment tested on a weekly basis and maintained as necessary? [3745-65-33] N
  - a. Does the facility keep an equipment testing log required by 3745-65-33(B), including date and time of test, name of person conducting the test, observations made, and date and nature of any repairs? N
5. If required due to the actual hazards associated with the waste, do personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled? [3745-65-34] Y
6. If required due to the actual hazards associated with the waste, is adequate aisle space maintained to allow unobstructed movement of emergency or spill control equipment? [3745-65-35] Y

MANIFEST REQUIREMENTS (OAC 3745-52-20 TO 3745-52-23)

Y/N/NA RMK #

1. Does the generator meet the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:
  - a. All hazardous wastes shipped off-site have been accompanied by a completed manifest, US EPA form 8700-22 in compliance with 3745-52-20 (A)?
  - b. The manifest contains all information required by 3745-52-20 and the minimum number of copies required by 3745-52-22?
  - c. The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with 3745-52-20 (C) (D) (E)?
  - d. Prepared manifests have been signed by the generator and initial transporter in compliance with 3745-52-23 (A) (1) (2)?
2. Has the generator received a return copy of each completed manifest within thirty-five (35) days of the date the waste was accepted by the initial transporter?
  - a. If not, has the generator complied with the manifest exception reporting requirements in 3745-52-42?
- NOTE: The manifest exception reporting requirement identified in Question #2 above is applicable to large quantity generators only. See Question #3 for manifest exception reporting requirements for small quantity generators.
3. If the generator is acting as a small quantity generator, (> 100 kg but < 1000 kg of hazardous waste in a calendar month) has the generator received a return copy of each completed manifest within sixty days of receipt by the initial transporter? [3745-52-42 (B)]
  - a. If not, did the generator submit a legible copy of the manifest with some indication that the generator has not received confirmation of delivery to the Ohio EPA? [3745-52-42 (B)]
4. Are signed copies of all hazardous waste manifests and any documentation required for Exception Reports retained for at least 3 years as required by 3745-52-40?

Y

Y

Y

Y

NA

NA

Y

NA

Y

USE AND MANAGEMENT OF CONTAINERS (OAC 3745-66-70 TO 3745-66-77) Y/N/NA RMK #

1. Are hazardous wastes stored in containers which are:
  - a. Closed? [3745-66-73(A)] N \_\_\_\_\_
  - b. In good condition? [3745-66-71] Y \_\_\_\_\_
  - c. Compatible with wastes stored in them? [3745-66-72] Y \_\_\_\_\_
2. Are containers stored closed except when it is necessary to add or remove wastes? [3745-66-73(A)] N \_\_\_\_\_
3. Are hazardous waste containers stored, handled and opened in a manner which prevents container rupture or leakage? [3745-66-73(B)] Y \_\_\_\_\_
4. Is the area where containers are stored inspected for evidence of leaks or corrosion at least weekly? [3745-66-74] NA \_\_\_\_\_
5. Is the facility recording inspections described in Question #4 in an inspection log or inspection summary as required by OAC 3745-66-74(B) which contains the following information:
  - a. Date and time of inspections? NA \_\_\_\_\_
  - b. Name of inspector? \_\_\_\_\_
  - c. Notation of observations made during the inspection? \_\_\_\_\_
  - d. The date and nature of any repairs or other remedial action? ↓ \_\_\_\_\_
6. Are ignitable and/or reactive hazardous waste(s) being managed at the facility? If so,
  - a. Are containers holding ignitable or reactive waste located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] Y \_\_\_\_\_
  - b. Are containers holding hazardous wastes stored separately from other materials which may interact with the waste in a hazardous manner? [3745-66-77(C)] NA \_\_\_\_\_

NOTE: Small Quantity Generators are not required to comply with OAC Rule 3745-66-67 (except for wastes being accumulated in satellite accumulation areas). [See OAC Rules 3745-52-34(D) (2) and (C) (1) (a)]



OAC CHAPTER 3745-59 - LDR GENERAL REQUIREMENTS

CASE-BY-CASE EXTENSIONS

Y/N/NA RMK#

1. Has the entity received an extension for compliance with land disposal restrictions from US EPA pursuant to 40 CFR 268.5? If yes,

N

(a) List the waste(s) affected:

- (b) Has the extension been recognized by the Director of Ohio EPA? [O.A.C. Rule 3745-59-05(C)]

NA

(c) When does the extension expire? \_\_\_\_\_

NOTE: A case-by-case extension can be granted for up to one year. The extension is renewable once (by US EPA) for an additional year. Until receiving approval of the extension by US EPA and recognition of the extension by the Director of Ohio EPA, the entity must continue to manage the waste in accordance with all applicable LDR requirements.

VARIANCE FROM A TREATMENT STANDARD

2. Has the entity been granted a variance from a treatment standard by US EPA pursuant to 40 CFR 268.44? If yes,

N

(a) List the waste(s) affected:

- (b) Has the variance been recognized by the Director of Ohio EPA? [O.A.C. Rule 3745-59-44(C)]

NA

NOTE: Until the variance has been approved by US EPA and recognized by the Director of Ohio EPA, the entity must continue to manage the waste in compliance with the LDR requirements.

NO MIGRATION PETITION

Y/N/NA RMK#

3. Has the entity received a variance from US EPA to allow for continued land disposal of untreated LDR wastes based upon a demonstration that there will be no migration from the disposal unit pursuant to 40 CFR 268.6? If yes,

N \_\_\_\_\_

(a) List the waste(s) affected:

- (b) Has the entity's "no migration" demonstration been recognized by the Director of Ohio EPA? [O.A.C. Rule 3745-59-06(C)]

NA \_\_\_\_\_

NOTE: Until the no migration petition has been approved by US EPA and recognized by the Director of Ohio EPA, the entity must continue to manage the waste in compliance with the LDR requirements.

PROHIBITION AGAINST DILUTION

4. Does the entity dilute a restricted waste or a treatment residue from a restricted waste: [O.A.C. Rule 3745-59-03; 40 CFR 268.3]

(a) As a substitute for adequate treatment to achieve compliance with LDR treatment standards?

N \_\_\_\_\_

(b) To circumvent the effective date of a prohibition (e.g. to dilute a "non-wastewater" waste to a "wastewater" to avoid complying with the "non-wastewater" treatment standard)?

N \_\_\_\_\_

(c) To otherwise avoid a prohibition in O.A.C. Rules 3745-59-30 through 3745-59-35 (40 CFR 268.30 through 268.35)?

N \_\_\_\_\_

(d) To otherwise avoid a prohibition imposed by Section 3004 of RCRA?

N \_\_\_\_\_

NOTE: If the answer to any of the Questions 4(a) through 4(d) above is yes, the entity is impermissibly diluting a restricted waste and is in violation of O.A.C. Rule 3745-59-03 (40 CFR 268.3).

NOTE: Dilution of wastes is permissible under some conditions. See O.A.C. Rule 3745-59-03(B) (40 CFR 268.3) and the Third Third final rule preamble for additional information.

LDR - GENERATOR REQUIREMENTS

NOTE: The following requirements apply only to large quantity generators and small quantity generators. Conditionally exempt small quantity generators are exempt from land disposal restriction requirements as referenced in O.A.C. Rules 3745-59-01(E) (1) (40 CFR 268.1(e) (1)) and 3745-51-05(B) (40 CFR 261.5(b)).

EVALUATION OF WASTES/DETERMINING APPROPRIATE TREATMENT STANDARDS

Y/N/NA RMK#

1. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [O.A.C. Rule 3745-59-07(A); 40 CFR 268.7(a)]
  - (a) For determinations based solely on knowledge of the waste: Is supporting data used to make this determination being retained on-site? [O.A.C. Rule 3745-59-07(A) (5); 40 CFR 268.7(a) (5)]
  - (b) For determinations based upon analytical testing: Is a copy of waste analysis data being retained on-site? [O.A.C. Rule 3745-59-07(A) (5); 40 CFR 268.7(a) (5)]
2. Has the generator determined the correct "treatability group" for each waste restricted from land disposal (e.g. wastewater, non-wastewater, high arsenic, low arsenic, high zinc, low zinc, etc.)? [O.A.C. Rule 3745-59-07(A); 40 CFR 268.7(a)]
3. Has the generator correctly determined if restricted wastes meet or exceed treatment standards? [O.A.C. Rule 3745-59-07(A); 40 CFR 268.7(a)]
4. Does the entity generate any listed waste(s) which are restricted from land disposal? If so,
  - (a) Do such wastes also exhibit hazardous waste characteristics as identified in O.A.C. Rules 3745-51-20 to 3745-52-24? (40 CFR 261.20 through 261.24)?
  - (b) For listed wastes which also exhibit a characteristic: Does the generator also identify the appropriate treatment standard for the constituent(s) which cause the waste to exhibit the characteristic(s)? [O.A.C. Rule 3745-59-09(A); 40 CFR 268.9(a)]

NOTE: The generator is not required to identify the treatment standard for the characteristic if the listing covers the associated characteristic (e.g. a F019/D007 hazardous waste - F019 being listed due to chromium content and D007 being the characteristic waste code for chromium). [See O.A.C. Rule 3745-59-09(B); 40 CFR 268.9(b)]

## TREATMENT OF CHARACTERISTIC HAZARDOUS WASTE

Y/N/NA RMK#

5. Does the generator treat characteristic hazardous waste(s) in a RCRA-exempt unit to render such wastes non-hazardous?

N \_\_\_\_\_

(a) If so, are treated waste(s) sent to a licensed solid waste disposal facility?

NA \_\_\_\_\_

i. If so, with each shipment of waste, does the generator submit a notification and certification to the Regional Administrator/Director which contains the following:

a. Name and address of the facility receiving the waste? [O.A.C. Rule 3745-59-09 (D) (1) (a); 40 CFR 268.9 (d) (1) (i)]

NA \_\_\_\_\_

b. A description of the waste as initially generated, including EPA hazardous waste numbers and treatability group? [O.A.C. Rule 3745-59-09 (D) (1) (b); 40 CFR 268.9 (d) (1) (ii)]

\_\_\_\_\_

c. The treatment standards applicable to the waste at the initial point of generation? [O.A.C. Rule 3745-59-09 (D) (1) (c); 40 CFR 268.9 (d) (1) (iii)]

\_\_\_\_\_

ii. Is the certification signed by an authorized representative and does it contain the language in O.A.C. Rule 3745-59-07 (B) (5) (a) (40 CFR 268.7 (b) (5) (i)? [O.A.C. Rule 3745-59-09 (D) (2); 40 CFR 268.9 (d) (2)]

\_\_\_\_\_

NOTE: An example of a RCRA-exempt unit would include an elementary neutralization unit or a wastewater treatment unit as defined by O.A.C. Rule 3745-50-10. [See O.A.C. Rule 3745-65-01]

## REMARKS

NOTIFICATION/CERTIFICATION

Y/N/NA RMK#

6. For wastes that do not meet treatment standards: Does the generator notify the treatment/storage facility receiving the wastes, in writing, that wastes being received do not meet treatment standards? [O.A.C. Rule 3745-59-07(A) (1); 40 CFR 268.7(a) (1)]

Y \_\_\_\_\_

If so, does the notification include the following:

- (a) EPA hazardous waste number? [O.A.C. Rule 3745-59-07(A) (1) (a); 40 CFR 268.7(a) (1) (i)]

Y \_\_\_\_\_

- (b) Appropriate treatment standard for the waste? [O.A.C. Rule 3745-59-07(A) (1) (b); 40 CFR 268.7(a) (1) (ii)]

Y \_\_\_\_\_

- (c) The manifest number associated with the shipment of waste? [O.A.C. Rule 3745-59-07(A) (1) (c); 40 CFR 268.7(a) (1) (iii)]

Y \_\_\_\_\_

- (d) Waste analysis data, where available? [O.A.C. Rule 3745-59-07(A) (1) (d); 40 CFR 268.7(a) (1) (iv)]

NA \_\_\_\_\_

7. Is the notification identified in Question #6 submitted with each shipment of waste? [O.A.C. Rule 3745-59-07(A) (1); 40 CFR 268.7(a) (1)]

N \_\_\_\_\_

8. For wastes that meet treatment standards: Does the generator submit a written notice and certification to the treatment, storage or disposal facility receiving the wastes stating wastes being received meet applicable treatment standards? [O.A.C. Rule 3745-59-07(A) (2); 40 CFR 268.7(a) (2)]

NA \_\_\_\_\_

If so, does the notice/certification include the following:

- (a) EPA hazardous waste number? [O.A.C. Rule 3745-59-07(A) (2) (a) (i); 40 CFR 268.7(a) (2) (i) (A)]

| \_\_\_\_\_

- (b) The corresponding treatment standards and applicable prohibitions for the waste? [O.A.C. Rule 3745-59-07(A) (2) (a) (ii); 40 CFR 268.7(a) (2) (i) (B)]

| \_\_\_\_\_

- (c) The manifest number associated with the shipment of waste? [O.A.C. Rule 3745-59-07(A) (2) (a) (iii); 40 CFR 268.7(a) (2) (i) (C)]

| \_\_\_\_\_

- (d) Waste analysis data, where available? [O.A.C. Rule 3745-59-07(A) (2) (a) (iv); 40 CFR 268.7(a) (2) (i) (D)]

| \_\_\_\_\_

- (e) Is the certification signed by the generator or an authorized representative? [O.A.C. Rule 3745-59-07(A) (2) (b); 40 CFR 268.7(a) (2) (ii)]

| \_\_\_\_\_

✓ \_\_\_\_\_

- 

LDR (GENERATOR REQUIREMENTS) -4-

(5/29/92)  
FINAL

SMALL QUANTITY GENERATOR (SQG) REQUIREMENTS

WASTE EVALUATION (OAC 3745-52-11)

Y/N/NA RMK #

1. Have the wastes generated at the facility been evaluated as required under 3745-52-11? N \_\_\_\_\_

(a) Has the generator's evaluation identified in Question #1 included an evaluation for the (TC) Toxicity Characteristics identified in 3745-51-24? [3745-52-11(C)] N \_\_\_\_\_

NOTE: The TC Rule requirement noted above must include an evaluation of the metal as well as organic TC constituents identified in 3745-51-24.

If not, please specify those waste(s) which the SQG has failed to provide an adequate evaluation of:

GENERATOR CLASSIFICATION

2. Do quantities of hazardous waste accumulated on-site exceed 6000 kgs? (If so, TSD standards apply. Complete applicable TSD checklists.) [3745-52-34(D) and (F)] N \_\_\_\_\_

GENERATOR IDENTIFICATION NUMBER (OAC 3745-52-12)

3. Has the generator obtained an identification number from either US EPA or Ohio EPA as required under 3745-52-12 prior to treating, storing, disposing, transporting or offering hazardous waste for transport? Y \_\_\_\_\_

MANIFEST REQUIREMENTS (OAC 3745-52-20 TO 3745-52-23)

4. Are waste streams generated at the facility being reclaimed under a contractual agreement as defined in OAC 3745-52-20(F)? N \_\_\_\_\_

If not, the generator is subject to manifest requirements of OAC 3745-52-20 through 3745-52-23. Please complete the Manifest Requirements checklist to document compliance with these requirements.

SQG - EMERGENCY PROCEDURES/PREPAREDNESS AND PREVENTION  
(OAC 3745-65-30 TO 3745-65-37)

Y/N/NA RMK #

5. Is an emergency coordinator available at all times?  
[3745-52-34(D)(5)(a)]
6. Has the following information been posted by the  
telephone? [3745-52-34(D)(5)(b)]:
- a. Name and telephone number of emergency coordinator?
- b. Location of fire and spill control equipment?
- c. Telephone number of local fire department?
7. Have emergencies been reported to the National Response  
Center? [3745-52-34(D)(5)(d)]
8. Are all employees thoroughly familiar with proper  
handling and emergency procedures? [3745-52-34(D)(5)(c)]

Y

N

N

N

NA

Y

In addition to the above, the small quantity generator must comply with the "Preparedness and Prevention" requirements of OAC 3745-65-30 through 3745-65-37. Please complete the Preparedness and Prevention checklist to document compliance with these requirements.

SQG - ACCUMULATION OF HAZARDOUS WASTES (OAC 3745-52-34)

9. Is the generator accumulating hazardous wastes in  
containers? If so,
- a. Is the date accumulation began clearly marked on  
each container [3745-52-34(A)(2)]?
- b. Is each container clearly marked with the words  
"Hazardous Waste" [3745-52-34(A)(3)]?

N

NA

NA

In addition to the above, if the generator is accumulating hazardous waste in containers, please complete the Management of Containers checklist. If the Small Quantity Generator is operating a satellite accumulation area, the Satellite Accumulation Area Requirements portion of the checklist must also be completed.

10. Is the generator accumulating hazardous wastes in tanks?
- a. If so, is each tank clearly marked with the words  
"Hazardous Waste" [3745-52-34(A)(3)]?

N

NA

In addition to the above, if the generator is accumulating hazardous waste(s) in tanks, please complete the Accumulation in Tanks for SQG's checklist.

11. Has the generator accumulated hazardous wastes in excess of 180 days (or 270 days if the waste must be transported more than 200 miles)? [3745-52-34(E)]

N \_\_\_\_\_

a. If so, has the generator been granted an extension by the Director for accumulation in excess of 180 (or 270) days?

NA \_\_\_\_\_

REMARKS - SMALL QUANTITY GENERATOR REQUIREMENTS

1) No confirmed hazardous waste was being stored on-site at the time of the inspection.



OAC 3745-65-et seq. GENERAL FACILITY STANDARDS

IDENTIFICATION NUMBER (OAC 3745-65-11)

Y/N/NA RMK #

1. Has the facility owner/operator received an identification number from Ohio EPA (or US EPA) as required by OAC 3745-65-11?

Y \_\_\_\_\_

ANNUAL REPORT REQUIREMENT (OAC 3745-65-75)

2. Has the owner/operator submitted an annual Treatment-Storage-Disposal report to the Director of Ohio EPA by March 1st of each calendar year? [3745-65-75]

Y \_\_\_\_\_

WASTE ANALYSIS/WASTE ANALYSIS PLAN (OAC 3745-65-13)

3. Does the owner/operator (o/o) have a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat, store or dispose of the waste as required by 3745-65-13 (A) (1)?
4. Is the waste analysis repeated when a process or operation generating hazardous waste changes? [3745-65-13 (A) (3) (a)]
5. For off-site facilities; Is the waste analysis repeated when results of inspections under 3745-65-13 (A) (4) reveal hazardous waste received at the facility does not match the waste designated on the accompanying manifest? [3745-65-13 (A) (3) (b)]
6. Does o/o have a written waste analysis plan which includes the following information [3745-65-13 (B) (1) through (6)]:
- a. The parameters for which each hazardous waste will be analyzed and rationale for the selection of these parameters? [3745-65-13 (B) (1)]
- b. The test methods to be used? [3745-65-13 (B) (2)]
- c. The sampling method which will be used, either one of the sampling methods described in Appendix I of 3745-51-20 or an equivalent method as defined in OAC 3745-50-10? [3745-65-13 (B) (3) (a) (b)]
- d. The frequency with which the initial analysis of the waste will be reviewed/repeated to ensure that the analysis is accurate and up-to-date? [3745-65-13 (B) (4)]
- e. FOR OFF-SITE FACILITIES: The waste analysis that hazardous waste generators have agreed to supply? [3745-65-13 (B) (5)]

Y \_\_\_\_\_

Y 1 \_\_\_\_\_

NA \_\_\_\_\_

Y \_\_\_\_\_

Y \_\_\_\_\_

Y \_\_\_\_\_

Y \_\_\_\_\_

NA \_\_\_\_\_

- f. FOR OFF-SITE FACILITIES: The sampling methods and procedures which will be used to inspect and, if necessary, analyze each movement of hazardous waste received at the facility to ensure that it matches the identification of the waste on the manifest [3745-65-13(C)]?

NA

- g. FOR FACILITIES OPERATING SURFACE IMPOUNDMENTS EXEMPT FROM LAND DISPOSAL RESTRICTIONS UNDER 3745-59-04(A):

NA

Does the waste analysis plan include procedures and schedules for:

- i. The sampling of impoundment contents? [3745-65-13(B)(7)]
- ii. The analysis of test data? [3745-65-13(B)(7)]
- iii. The annual removal of residues which are not delisted or which exhibit the characteristic of a hazardous waste and either do not meet treatment standards (3745-59-44) or where no treatment standards have been established? [3745-65-13(B)(7)]

- h. Where applicable: The methods which will be used to meet the additional waste analysis requirements of rules 3745-59-07, 3745-67-25, 3745-67-52, 3745-67-73, 3745-68-14, 3745-68-41, 3745-68-75 and 3745-69-02 of the OAC? [3745-65-13(B)(6)]

#### WASTE ANALYSIS PLAN - LDR REQUIREMENTS

NOTE: The following requirements identified in Question #7 apply to both on-site and off-site TSD facilities.

7. In accordance with OAC Rule 3745-65-13(B)(6), does the the facility's waste analysis plan includes analytical procedures necessary to ensure compliance with the land disposal restriction requirements of Chapter 3745-59, including:

- a. Procedures for conducting the TCLP for wastes which have a CCWE treatment standard?
- b. Procedures for conducting a total constituent analysis for wastes which have a CCWE treatment standard?

Y

Y

OPERATING RECORD REQUIREMENTS (OAC 3745-65-73)

Y/N/NA RMK #

1. Does the o/o maintain a written operating record at the facility as required by 3745-65-73 which contains the following information:
  - a. Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date and method pertinent to such treatment, storage or disposal? [3745-65-73 (B) (1)]
  - b. As required by the Appendix to 3745-65-73, does the information specified in Question 1a include:
    - i. Common name, EPA hazardous waste identification number and physical state (solid, liquid, gas) of the waste?
    - ii. The estimated (or actual) weight, volume or density of the waste?
    - iii. A description of the method(s) used to treat, store or dispose of the waste using the EPA handling codes listed in Table 2 of OAC 3745-65-73?
  - c. The present physical location of each hazardous waste within the facility and cross references to specific manifest document numbers?
  - d. Records of incidents which required implementation of the contingency plan?
  - e. Records of any waste analyses and trial tests required to be performed?
  - f. Records of the inspections required by the general inspection requirements under 3745-65-15?
  - g. Records of any monitoring, or analytical data required under other subparts as referenced by 3745-65-73 (B) (6)?
  - h. FOR DISPOSAL FACILITIES, location and quantity of each hazardous waste recorded on a facility map and cross-references to manifest document numbers? [3745-65-73 (B) (2)]
  - i. Records of closure cost estimates and post-closure (DISPOSAL ONLY) cost estimates required by OAC 3745-66?

NA

↓

NA

NA

2. Does the operating record include documentation required to be maintained under the land disposal restriction requirements of Chapter 3745-59? [3745-65-73(b) (9) through (14)]

NA

NOTE: The following recordkeeping requirements are applicable only to off-site TSDS.

3. Are manifests received by the facility signed and dated? [3745-65-71(A) (1)]
4. Is one copy given to the transporter, one copy sent to the generator within 30 days and one copy kept for at least 3 years? [3745-65-71(A)]
- a. If shipping papers are used in lieu of manifests (bulk shipments, etc.), are the same requirements met [3745-65-71(B)]?
- b. Are any significant discrepancies in the manifest, as defined in 3745-65-72(A) noted in writing on the manifest document?
5. Have any manifest discrepancies been reconciled within 15 days as required by 3745-65-72(B) or has the o/o submitted the required information to the Director?
6. If the facility has accepted any unmanifested hazardous wastes from off-site sources for treatment, storage, or disposal, has an unmanifested waste report containing all the information required by 3745-65-76(A) been submitted to the Director within 15 days?

NA

## REMARKS - OPERATING RECORD REQUIREMENTS

1) Moritz stated at the time of the inspection that lead free paint is now used at the facility. The facility should recalculate the hazardous waste streams to determine their regulatory status.

GENERAL INSPECTION REQUIREMENTS (OAC 3745-65-15)

Y/N/NA RMK #

1. Does the o/o inspect the facility on a weekly basis for malfunctions, deterioration, operator errors and discharges which may cause a release of hazardous waste or hazardous waste constituents or may pose a threat to human health? [3745-65-15(A) (1) (2)] If so,

N \_\_\_\_\_

a. Are the inspections recorded in an inspection log or summary as required by 3745-65-15(D)? [3745-65-15(A)]

\_\_\_\_\_

b. Do records contain date and time of inspection, name of inspector, notation of observations made and date and nature of any repairs or remedial actions as required by 3745-65-15(D)? [3745-65-15(A)]

\_\_\_\_\_

c. Are inspection records maintained at the facility for at least (3) years as required by 3745-65-15(D)? [3745-65-15(A)]

\_\_\_\_\_

2. Has the owner/operator developed a written inspection schedule for inspecting; monitoring equipment, safety equipment, emergency equipment, security devices and operating and structural equipment (e.g. dikes, sumps)? [3745-65-15(B)] If so,

NA \_\_\_\_\_

a. Is the schedule kept at the facility? [3745-65-15(B) (2)]

\_\_\_\_\_

b. Does the schedule identify the types of problems which are to be looked for during the inspection? [3745-65-15(B) (3)]

\_\_\_\_\_

c. Does the schedule include inspection of areas subject to spills (i.e. loading and unloading areas) daily when in use and according to other applicable regulations when not in use? [3745-65-16(B) (4)]

✓ \_\_\_\_\_

NOTE: See Preparedness and Prevention checklist for additional testing/recordkeeping requirements applicable to emergency equipment.

REMARKS - GENERAL INSPECTION REQUIREMENTS

SECURITY REQUIREMENTS (OAC 3745-65-14)

Y/N/NA RMK #

1. a. Would physical contact with the waste structures or equipment injure unknowing/unauthorized person or livestock entering the facility? [3745-65-14(A)(1)]
- b. Would disturbance of the waste cause a violation of the hazardous waste regulations? [3745-65-14(A)(2)]

N \_\_\_\_\_

N \_\_\_\_\_

IF BOTH 1A AND 1B ARE NO, MARK QUESTIONS 2 AND 3 NOT APPLICABLE.

2. Does the facility have -

- a. A 24-hour surveillance system, or;

NA \_\_\_\_\_

- b. An artificial or natural barrier and a means to control entry at all times? [3745-65-14(B)(2)(a)(b)]

+ \_\_\_\_\_

3. Does the facility have a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary? [3745-65-14(C)]

↓ \_\_\_\_\_

REMARKS - SECURITY REQUIREMENTS



State of Ohio Environmental Protection Agency

## Northwest District Office

347 North Dunbridge Road

P.O. Box 466

Bowling Green, Ohio 43402-0466

(419) 352-8461 FAX (419) 352-8468

TO GO ON: ☒ RCRIS ☐ DBASE ☐ FO LOG ☐ USEPA LOG ☐ CJ LOG  
 ENTERED: ☒ RCRIS ☐ DBASE ☐ FO LOG ☐ USEPA LOG ☐ CJ LOG  
 RCRIS ENTRY CODES: (EVALUATION) \_\_\_\_\_ (ENFORCEMENT) 012  
 CEI ☐ CI ☐ OTHER ☒ INITIAL NOV ☐ FOLLOW-UP NOV ☐  
 FULL RTC ☐ PRTL RTC ☒ TCLP ☐ LOR ☐ SENT TO USEPA: YES ☐ NO ☐

JUN 22 1992

George V. Voinovich  
Governor

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AUG 04 1992

OFFICE OF RCRA  
Waste Management Division  
U.S. EPA, DHEW

Re: Moritz, Incorporated  
 OHD 982 218 489  
 Richland County  
 Partial Return to Compliance  
 Hazardous Waste

June 19, 1992

Mr. Jim Boyd  
 Moritz, Incorporated  
 400 Park Avenue  
 Mansfield, Ohio 44905

Dear Mr. Boyd:

This Partial Return to Compliance (PRTC) letter is a result of the Ohio Environmental Protection Agency's (OEPA) review of the revised Waste Analysis, Training and Contingency Plans which Moritz submitted on March 27, 1992. The following comments are in reference to the violations that were cited in the Agency's January 10, 1991, Notice of Violation (NOV) letter:

1. Violation 2  
 OAC Rule 3745-65-13

In an October 4, 1991, PRTC, the facility was requested to address a number of issues in the Waste Analysis Plan. Two (2) of these issues still remain:

- a. The plan must be revised to include solvent TCLP analysis for hazardous waste.
- b. The plan must be revised to describe the Land Disposal Restriction Notice that will be provided with each hazardous waste shipment. Include examples of each notice.

2. Violation 4  
 OAC Rule 3745-65-16

On page one (1) of the Training Plan, the facility states that the introductory training program is outlined in Appendix E, Section III, titled Written Hazard Communication Program. On page four (4), it is written



Mr. Jim Boyd  
June 19, 1992  
Page Two

that Appendix E is provided to comply with Federal OSHA standards. In reviewing this section, it states that the company will provide training to current employees, to be completed by May 25, 1986. The Ohio EPA requests that Moritz provide an introductory program as per OAC 3745-65-16. Current information should also be submitted.

3. Violation 5  
OAC 3745-65-51

Moritz has addressed all the Contingency Plan deficiencies that were stated in the October 4, 1991, PRTC. Therefore, this violation has been corrected.

4. Violation 6  
OAC Rule 3745-65-55

In the January 10, 1991, NOV, Moritz was cited for not designating an emergency coordinator. This violation has been corrected since the facility designated an emergency coordinator in their March 27, 1992, Contingency Plan.

5. Violation 8  
OAC 3745-66-12(B) (5)

The Revised Ground Water Monitoring, Sampling and Analysis Plan was established as a condition for the Land Disposal Unit Closure Plan which was approved on April 26, 1991. On March 12, 1992, the Revised Ground Water Monitoring, Sampling and Analysis Plan was approved. As a result, Moritz has an approved closure plan that includes a description of all activities necessary to ensure that closure satisfies the closure performance standards including, but not limited to, groundwater monitoring. Therefore, this violation has been corrected.

The following violations remain outstanding:

6. Violation 9  
OAC Rule 3745-68-02

Moritz, Inc. has failed to comply with the general operating requirements for a hazardous waste landfill including, but not limited to: (a) run-on control system; (b) run-off management system; (c) collection and

Mr. Jim Boyd  
June 19, 1992  
Page Three

holding facility management; and (d) cover or wind dispersal management. The Agency requests that an earthen dike or a similar system be constructed to prevent run-on of storm water. As for the run-off, collection and management system, Moritz must use tanks or basins to manage this water. To prevent wind dispersal, the facility must periodically wet down the cover of the landfill.

7. Violation 11  
OAC Rule 3745-59-07 and 40 CFR 268.7

Moritz, Inc. has failed to include the corresponding treatment standards and all applicable prohibitions in its notification to the treatment, storage and disposal facility pertaining to the land disposal restriction rules. In order to correct this violation, the facility must submit all completed LDR forms since the violation was cited on January 10, 1991.

According to the approved revised closure plan schedule for the Land Disposal Unit, the completion of the closure activities was to be final within one hundred twenty (120) days following Ohio EPA approval. Since the plan was approved on April 26, 1991, the completion of the closure activities should have been completed by the end of August, 1991. As of this date, the closure has not been completed nor has the Agency received from Moritz a request for extension in accordance with OAC 3745-66-13.

The Ohio EPA is aware that the submittal and review of the Ground Water, Sampling and Analysis Plan and the Statistical Analysis Report for Clean Level Determination caused some delays in allowing the performance of closure activities. However, these submittals were approved in March of 1992. These plans have not been implemented at this time. The facility must immediately begin to conduct the clean-up activities in accordance with the approved closure plan and all supplemental plans.

As indicated in the October 4, 1991, PRTC and February 12, 1992, PRTC, Moritz must submit a closure plan for the waste solvent areas and the waste dried paint storage areas mentioned in paragraphs A, B and C of the January 10, 1991 NOV. The closure plans must be submitted immediately.

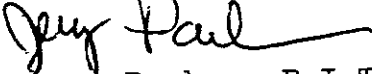
Mr. Jim Boyd  
June 19, 1992  
Page Four

Please respond, to this letter within ten (10) days. Your response must include all actions and timetables necessary to demonstrate compliance. This letter does not release, in any manner, Moritz Incorporated or any other responsible party's liability for past violations of Ohio's hazardous waste law at this facility. Whether Moritz Incorporated is currently in compliance with Ohio's hazardous waste regulations does not prevent the Ohio EPA from taking appropriate enforcement action to address past violations, pursuant to Chapter 3734 of the Ohio Revised Code.

Failure to list specific deficiencies in this letter does not relieve Moritz from the responsibility of complying with all applicable hazardous waste regulations.

If you have any questions, please contact me at (419) 352-8461.

Sincerely,



Jerry Parker, E.I.T.  
Division of Hazardous Waste Management

/jks

pc: Lori Massey, AGO  
Laurie Stevenson, DHWM, CO  
Nyall McAnna, DHWM, CO  
Cindy Lohrbach, DHWM, NWDO  
A & C Representative  
NWDO File



State of Ohio Environmental Protection Agency

**Northwest District Office**

347 North Dunbridge Road  
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AUG 04 1992

OFFICE OF RCRA  
Waste Management Division  
U.S. EPA, REGION 5

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CEI ☐ CI ☐ OTHER ☐ INITIAL NOV ☐ FOLLOW-UP NOV ☒  
FULL RTC ☐ PRTL RTC ☒ TCLP ☐ LDR ☐ SENT TO USEPA: YES ☐ NO ☐

George V. Voinovich  
Governor

Re: Moritz, Inc.  
OHD 982 218 489  
Richland County  
Hazardous Waste

February 12, 1992

Mr. Jim Boyd  
Moritz, Inc.  
400 Park Avenue  
Mansfield, Ohio 44905

RECEIVED  
OHIO EPA  
FEB 14 1992  
DIV. OF HAZARDOUS WASTE MGT

Dear Mr. Boyd:

This letter serves as a follow up to our meeting of December 6, 1991, conducted with yourself, myself, and Mr. Philip Williams of the Ohio EPA. This meeting was held in response to an Ohio EPA Notice of Violation (NOV) letter dated January 10, 1991, and a Partial Return to Compliance (PRTC) letter dated October 4, 1991.

During the December 6, 1991, meeting, you provided a copy of the hazardous waste manifest requested in Paragraph B of the January 10, 1991, NOV; thus verifying Moritz's response submitted to the Ohio EPA on February 8, 1991.

The Ohio EPA inadvertently omitted three violations in the October 4, 1991, PRTC letter, which Moritz has failed to comply with. These violations were noted in the January 10, 1991, NOV and remain outstanding. These violations are restated below:

1. Violation 6 - OAC Rule 3745-65-55

Moritz, Inc., does not have a designated emergency coordinator(s) who is thoroughly familiar with all aspects of a facility contingency plan including the following: all operations and activities at the facility, the location and characteristics of all waste stored, and the location of all records within the facility.

The facility contingency plan was reviewed by this office. Several deficiencies were noted and documented in the October 4, 1991, PRTC. As of this date, a revised contingency plan has not been submitted to this Agency. Therefore, this Agency believes that a designated emergency coordinator(s) cannot be thoroughly familiar with the contingency plan until such plan is revised.

Mr. Jim Boyd  
February 12, 1992  
Page Two

2. Violation 9 - OAC Rule 3745-68-02

Moritz, Inc., has failed to comply with the general operating requirements for a hazardous waste landfill including, but not limited to: (a) run-on control system; (b) run-off management system; (c) collection and holding facility management; and (d) cover or wind dispersal management.

3. Violation 11 - OAC Rule 3745-59-07 and 40 CFR 268.7

Moritz, Inc., has failed to include the corresponding treatment standards and all applicable prohibitions in its notification to the treatment, storage and disposal facility pertaining to the land disposal restriction rules for first third wastes.

In addition to the above violations, the Ohio EPA has the following comments and/or recommendations:

On April 26, 1991, the Ohio EPA approved the Moritz Land Disposal Unit Closure Plan with modifications; thus abating violation #10 of the January 10, 1991, NOV.

On August 12, 1991, the Ohio EPA received the Statistical Analysis Report for Clean Level Determination for the land disposal closure area. This report has been reviewed by Ohio EPA Central Office staff, specifically Paul Vandermeer, DHWM, and was approved as submitted. In addition, this Agency received on August 12, 1991, the Closure Plan Lab Analyses for this area. This document is currently being reviewed by the Ohio EPA, DHWM staff.

On January 13, 1992, the Ohio EPA received the Revised Ground Water Monitoring, Sampling and Analysis Plan. This plan is currently being reviewed by the Division of Drinking and Ground Waters. Therefore, Violation #8 of the January 10, 1991, NOV remains outstanding.

At the present time, the Agency is waiting for the following information requested in the October 4, 1991, PRTC:

1. As indicated in the January 10, 1991, NOV and the October 4, 1991, PRTC, Moritz must submit a closure plan for the waste solvent areas and the waste dried paint storage areas mentioned in paragraphs A, B and C of the January 10, 1991, NOV. The closure plans must be submitted within 30 days.

Mr. Jim Boyd  
February 12, 1992  
Page Three

2. Moritz has failed to respond to the deficiencies outlined in the October 4, 1991, PRTC regarding the facility's Waste Analysis plan, Contingency plan, and training program.

Please respond to this letter within ten days. Your response must conform to the requirements that remain outstanding from the January 10, 1991, NOV and all deficiencies in the above mentioned plans.

Moritz's continued noncompliance with Ohio's hazardous waste regulations may be cause for enforcement action pursuant to Chapter 3734 of the Ohio Revised Code. Failure to list specific deficiencies in this letter does not relieve Moritz from the responsibility of complying with all applicable hazardous waste regulations.

If you have any questions, please contact me at (419) 352-8461.

Sincerely,



Jerry L. Parker, E.I.T.  
Division of Hazardous Waste Management

/jlm

pc: Chris Korleski, AGO  
Laurie Stevenson, DHWM, CO  
Jeff Mayhugh, DHWM, CO  
Cindy Lohrbach, DHWM, NWDO  
A & C Representative  
NWDO File

# RCRA INTERIM STATUS INSPECTION FORM

Facility Name: Moritz, Inc.  
 Address: 400 Park Ave East  
Wausau, Wis 54985  
 County: Richland  
 Facility Contact: Tom Moritz  
Frank Moritz  
 Inspector(s) Name(s): Don North DEPA-NW200

Date of Inspection 10-23-90, 10-29-90  
 HWFB #: \_\_\_\_\_  
 USEPA ID #: QHD 982218489 (Trailer Master Ltd.)  
 Facility Phone #: (414) 522-2323  
 Facility Contact Phone #: \_\_\_\_\_  
 Safety Equipment #: \_\_\_\_\_

## STATUS

Cond. Ex. SQG ☒ SQG ☒ Generator ☒ Transporter ☒ Treatment ☒ Storage ☒ Disposal ☒

ACTIVITIES

Containers ☒ Tanks ☒ Surface Impoundments ☒ Incineration/Thermal treatment ☒  
 Waste pile ☒ Land treatment ☒ Landfill ☒ Groundwater monitoring ☒  
 Used oil burner ☒ Hazardous waste fuel burner/blender ☒

1. Does the facility produce "discarded materials" as defined in 3745-51-02(A)?

2. Are they:

- a. Abandoned (disposed; incinerated; accumulated; stored, or treated prior to disposal)?
- b. Recycled?

c. Inherently waste-like? (F020, F021, F022, F023, F026, F028)?

3. If recycled or accumulated, treated or stored before recycling, is the waste:

- a. Used in a manner constituting disposal?
- b. Burned for energy recovery?
- c. Reclaimed? (Refer to Table 1 of 3745-51-02)
- d. Accumulated speculatively?

4. Is the material recycled by being:

- a. Used or reused as an ingredient in an industrial process to make a product without prior reclamation?
- b. Used as an effective substitute for commercial products?
- c. Returned to the original process from which it was generated without prior reclamation as a substitute for a raw material feedstock?

Y/N/NA	REMARK #
<u>Y</u>	<u>(1)</u>
<u>Y</u>	<u>(2)</u>
<u>N/A</u>	<u>(3)</u>
<u>N/A</u>	<u>(4)</u>
<u>N/A</u>	<u>(5)</u>
<u>N/A</u>	<u>(6)</u>
<u>N/A</u>	<u>(7)</u>
<u>N/A</u>	<u>(8)</u>
<u>N/A</u>	<u>(9)</u>
<u>N/A</u>	<u>(10)</u>

\* Xylene used to clean trailers containing oil. Can't be used to clean trailers. Will be replaced very soon by kerosene.

Recently cleaned (1) Waste paint and solvent sent off-site to North East Chemical Corporation. (2) Waste paint and solvent added to primer just recently. (3) Waste paint and solvent returned to primer as substitute for feedstock.

	Y/N/NA	REMARK #
5. Are Land Disposal Restricted (LDR) wastes generated? If so, complete appropriate LDR checklist.	Y	
6. Has the facility submitted a Part A application to Ohio EPA in accordance with OAC 3745-50-40?	N	
7. If yes, is it complete and accurate and does it contain all information specified in OAC 3745-50-41, -42, -43?	NA	
8. If not accurate, has a Permit Change Request (PCR) been submitted in accordance with 3745-50-51? If yes, what date was the PCR submitted.		
9. Is the facility operating in compliance with the terms and conditions of its HWFB permit?		
10. Has the facility submitted a Part B?		
11. Was advance notice of the inspection given? If so, how far in advance?	N	(4)

4 Unannounced inspection. Jim Boyd was in Columbus on business.  
 Followup w/ Jim Boyd conducted 10-29-90.

# REMARKS. GENERAL INFORMATION.

Include list of wastes being generated/managed at the site and a brief description of site activity and waste handling.

Monty, Inc. fabricates horse and livestock trailers. In the past production was ~ 50 trailers/mo. Currently production is greatly reduced due to reduced demand. Therefore, waste generation is also greatly reduced - also due to painting efforts. The process involves the stripping and welding of steel parts, preping the trailers for painting by wiping down w/ solvent, and spray painting the finished trailer. Paint and solvent have been dumped behind the spray painting area of the plant. Two photos in the file depict this area. Because of this illegal disposal the facility is considered a land disposal facility.

Three different solvents can be used to thin paint. 1. Xylene <sup>(and wipe down trailers prior to painting)</sup> 2. Toluene - cold temperature painting 3. Hi Sol <sup>(petroleum naphtha)</sup> warm temp. painting. The paint your worries are cleaned (solvent) in Klean Strip, Spray-Gun Kleener which consists of methylene chloride, cresols, xylene, phenols and potassium hydroxide. A lacquer thinner. The dirty solvent is used to thin the primer. In the past the waste solvents and paint were dumped on the ground → then shipped off-site → now added back into primer. In the past the paint drying agent (additive) contained lead (PbOS). Therefore, the lead waste paint from the floor was drummed and sent off-site. Currently the co. does not use a lead based drying agent. Therefore, very soon, when old inventory used up, they will no longer generate (PbOS).

Currently ~ 2 gal/wk of waste <sup>dry</sup> paint is generated. Kinkor manufactures the new paint used.

Trailer Mader Ltd. Co. has gone out of business. Trailers are now painted by Top Cat, Inc. which is run by Jim Boyd. The place is leased by Top Cat, Inc. and was also leased by Trailer Mader, which was owned by Maryanna and Donald Kart. The xylene used to clean trailers will soon be replaced w/ Fantastix.

Small Quantity Generator, Conditionally Exempt SQG

	<u>Y/N/NA</u>	<u>REMARK #</u>
1. Have the wastes generated at this facility been evaluated as required under 3745-52-11 (262.11)?	N/A	
2. Does the generator produce <100 kg of waste per month? (conditionally exempt SQG)		
3. Does the conditionally exempt SQG generate acutely hazardous waste in quantities exceeding those specified in 3745-51-05(E), 3745-51-05(F)		
4. Does the conditionally exempt SQG ensure delivery to an off-site permitted TSD?		
5. Do quantities of hazardous waste accumulated on-site at any one time exceed 1000 kg - or does the generator produce between 100 and 1000 kg of hazardous waste per month - (SQG)? If so, complete items 6-21.		
<u>SQG</u>		
6. Have the wastes generated at this facility been evaluated as required under 3745-52-11 (262.11)?	*	(U)
7. Do quantities of hazardous waste accumulated on-site ever exceed 6000 kg/s? (If so, TSD standards apply. Complete application TSD checklists.) [3745-52-34(D) and (F)] (262.34(d) and 262.34(f))	N	
8. If wastes are stored in containers, are wastes placed in containers in compliance with 3745-66-70 to 3745-66-77 except 3745-66-76? [3745-52-34(D)(2)] (262.34(d)(2) Complete <u>Management of Containers</u> checklist.	✓	
9. If wastes are stored in tanks, are wastes stored in tanks in compliance with 3745-66-992? Complete <u>Accumulation in Tanks</u> for SQG's checklist.	N/A	

(1) Evaluation performed by Northeast Chemical Corporation, however, the waste on manifest 52990 dated 6-8-90 was not properly evaluated. The waste contains Pb.

	Y/N/NA	REMARK #
10. Is the date accumulation began clearly marked on each container? [3745-52-34(A)(2)] (262.34(a)(2))	Y	
11. Is each container or tank clearly marked with the words "Hazardous Waste"? [3745-52-34(A)(3)] (262.34(a)(3))	Y	
12. Does the generator comply with the "Preparedness and Prevention" requirements for owners and operators of hazardous waste facilities? [3745-52-34(D)(4)] (262.34(d)(4)) Complete Preparedness and Prevention checklist.	✓	
13. Is an emergency coordinator available at all times? [3745-52-34(D)(5)(a)] (262.34)	N	
14. Has the following information been posted by the telephone? [3745-52-34(D)(5)(b)] (262.34) a. Name and telephone number of emergency coordinator. b. Location of fire and spill control equipment. c. Telephone number of local fire department.	N Y Y	(2)
15. Have emergencies been reported to the National Response Center? [3745-52-34(D)(5)(d)] (262.34)	N/A	
16. Has the generator accumulated hazardous wastes in excess of 180 days (or 270 days if the waste must be transported more than 200 miles)? [3745-52-34(E)] (262.34(e))	Y	
17. Has the generator been granted an extension by the Director/Regional Administrator for accumulation in excess of 180 days?	N	
18. Have waste shipments been accompanied by a completed manifest? [3745-52-23] (262.23) If no, is the waste being reclaimed under a contractual agreement in accordance with OAC 3745-52-20(F) (262.20(f))?	Y	
19. Are signed copies of manifests retained for at least 3 years? [3745-52-40] (262.40)	N/A	
	Y	

(2) Five extinguishers are marked in the plant & the staff are aware of their location. American Chemical  
absorbed compound will be located in the paint area.

Y/N/NA      REMARK #

20.      Has the generator treated, stored, disposed of, transported or offered for transportation hazardous waste without having obtained a USEPA identification number from the Administrator as required under 3745-52-12 (262.12)?

N      \_\_\_\_\_

21.      Are all employees thorough familiar with proper handling and emergency procedures? [3745-52-34(D)(4)(c)] (265.34(d)(4)(iii))

\*      (3)

(3) The last training was one month ago when Top Cat took over the paint shop  
 Jim Boyd has the sole responsibility for container labeling.

OAC 3745-65-et seq. GENERAL FACILITY STANDARDS (40 CFR Part 265, SUBPART B)

	Y/N/NA	REMARK #
1. Does the owner/operator (o/o) have a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by 3745-65-13(A)(1) (265.13(a))?	*	(1)
2. Does o/o have a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste. [3745-65-13(B)] (265.13(b))	N	
3. a. Would physical contact with the waste structures or equipment injure unknowing/unauthorized person or livestock entering the facility? [3745-65-14(A)(1)] (265.14(a)(1))	Y	
b. Would disturbance of the waste cause a violation of the hazardous waste regulations? [3745-65-14(A)(2)] (265.14(a)(2))	Y	
IF BOTH 3A AND 3B ARE NO, MARK QUESTIONS 4 AND 5 NOT APPLICABLE.		
4. Does the facility have -		
a. A 24-hour surveillance system, or	Y	(2)
b. An artificial or natural barrier and a means to control entry at all times [3745-65-14(B)(2)] (a and b) (265.14(b)(2))	Y	(3)
5. Does the facility have a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary. [3745-65-14(C)] (265.14(c))	Y	
6. a. Has the o/o developed and followed a comprehensive, written inspection plan and documented the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. [3745-65-15] (265.15)	N	

Y/N/NA      REMARK #

- b.      Are areas subject to spills (i.e., loading and unloading areas, etc.) inspected daily when in use and according to other applicable regulations when not in use. [3745-65-16(B)(4)] (265.15(b)(4))        N
7.      Has the o/o provided a Personnel Training Program in compliance with 3745-65-16(A)(B)(C) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course? (265.16(a)(b)(c))        N
8.      Does o/o keep all records required by 3745-65-16(D)(E) including written job titles, job descriptions and documented employee training records? (265.16(d)(e))        N
9.      If Ignitable, Reactive or incompatible wastes are handled, does the facility meet the following requirements? [3745-65-17] (265.17)
- |    |   |                |                |
|----|---|----------------|----------------|
| a. | Protection from sources of ignition.  | <u>  Y  </u>   | <u>      </u>  |
| b. | Physical separation of incompatible waste materials.  | <u>  N/A  </u> | <u>      </u>  |
| c. | "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.             | <u>  Y  </u>   | <u>      </u>  |
| d. | Comingling of waste materials is done in a controlled, safe manner as prescribed by 3745-65-17(B) (265.17(b)) | <u>  Y  </u>   | <u>  (4)  </u> |

(1) Evaluation performed by Northeast Chemical Corporation. However, the waste on manifest 52990, dated 6-8-90 was not properly evaluated. This waste contains Pb.

(2) Cammies (3) Fence

(4) Only solvents and paint are comingled.

OAC 3745-65 PREPAREDNESS AND PREVENTION (40 CFR PART 265 SUBPART C)

	<u>Y/N/NA</u>	<u>REMARK #</u>
1. Is the facility operated to minimize the possibility of fire, explosion, or non-planned release of hazardous waste? [3745-65-31] (265.31)	<u>Y</u>	<u>(1)</u>
2. Has there been a fire, explosion or non-planned release of waste at the facility? a. If yes, has the contingency plan been implemented?	<u>NA</u>	<u>(1)</u>
3. It required due to actual hazards associated with the waste, does the facility have the following equipment: [3745-65-32(A)(B)(C)(D)] (265.32) a. Internal alarm system? b. Access to telephone, radio or other device for summoning emergency assistance? c. Portable fire control equipment? d. Water of adequate volume and pressure <u>via hoses</u> , sprinkler, foamers or sprayers?	<u>Y</u> <u>Y</u> <u>Y</u> <u>Y</u>	<u>(2)</u> <u></u> <u></u> <u></u>
4. Is all required spill control and decontamination equipment, fire and communications equipment tested and maintained as necessary? [3745-65-33] (265.33)	<u>Y</u>	<u></u>
5. If required due to the actual hazards associated with the waste, do personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled? [3745-65-34] (265.34)	<u>Y</u>	<u></u>
6. If required due to the actual hazards associated with the waste, is adequate aisle space to allow unobstructed movement of emergency or spill control equipment maintained? [3745-65-35] (265.35)	<u>Y</u>	<u></u>
7. If required due to the actual hazards associated with the waste, has the facility attempted to make appropriate arrangements with local authorities to familiarize them with the possible hazards and the facility layout? [3745-65-37(A)] (265.37(a))	<u>Y</u>	<u></u>

(1) However, please note this was not the case <sup>25</sup> the past. The facility dumped waste paint and solvent on the ground behind the paint department.

Y/N/NA      REMARK #

8.      Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements, has the refusal been documented. [3745-65-37(B)] (265.37(b))

N/A          

(2) PA System

OAC 3745-65 CONTINGENCY PLAN AND EMERGENCY PROCEDURES (40 CFR PART 265 SUBPART D)

	Y/N/NA	REMARK #
1. Does the o/o have a written Contingency Plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes which contains the following components for the facility? [3745-65-52(A)(B)(C)(D)(E)] (265.52):		
a. Actions to be taken by personnel in the event of an emergency incident?	N	
b. Arrangements or agreements with local or state emergency authorities?		
c. Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator?		
d. A list of all emergency equipment including location, physical description and outline of capabilities?		
e. If required due to the actual hazards associated with the waste handled, an evacuation plan for facility personnel? [3745-65-52(F)] (265.52(F))?		
2. Is a copy of the Contingency Plan and any plan revisions maintained on-site and has it been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan? [3745-65-53(A)(B)] (265.53)	N	
3. Is the plan revised in response to rule changes, facility, equipment and personnel changes or failure of the plan? [3745-65-54] (265.54)		
4. Is an emergency coordinator who is familiar with all aspects of site operation and emergency procedures who has the authority to implement all aspects of the Contingency Plan designated at all times (on-site or on-call)? [3745-65-56(A-J)] (265.56) See also pg 9 #13	N	
5. If an emergency situation has occurred, has the emergency coordinator implemented all or part of the Contingency Plan and taken all of the actions and made all of the notifications deemed necessary under 3745-65-56(A-J). (265.56(a-j))	*	(1)

(1) Please note in the past the facility dumped waste paint and solvents on the ground behind the paint department. Jim Boyd reported no other emergencies have occurred.

OAC 3745-65 MANIFEST SYSTEM/RECORDS/REPORTING (40 CFR PART 265, SUBPART E)

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

Y/N/NA REMARK #

1.	Does the o/o maintain a written operating record at the facility as required by 3745-65-73(A) (265.73) which contains the following information:		
a.	Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date and method pertinent to such treatment, storage or disposal? [3745-65-73(B)(1)] (265.73(b)(1)).	N	
b.	Common name, EPA Hazardous Waste Identification Number and physical state (solid, liquid, gas) of the waste?		
c.	The estimated (or actual) weight, volume or density of the waste material?		
d.	A description of the method(s) used to treat, store or dispose of the waste using the EPA handling codes listed in Table 2 of OAC 3745? (Part 265, Appendix I, Table 2)		
e.	The present physical location of each hazardous waste within the facility?		
f.	Records of incidents which require implementation of the Contingency Plan?		
g.	FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document numbers? [3745-65-73(B)(2)] (265.73(b)(2))		
h.	Records of any waste analyses and trial tests required to be performed?		
i.	Records of the inspections required under 3745-65-15 (265.15) (General Inspection Requirements)?		
j.	Records of any monitoring, testing, or analytical data required under other Subparts as referenced by 3745-65-73(B)(6); (265.73(b)(6))?		

Y/N/NA REMARK #

Y (1)

Y

N/A

k. Records of closure cost estimates and post-closure (DISPOSAL ONLY) cost estimates required under OAC 3745-66 (Part 265 Subpart G)?

2. Has the o/o submitted an annual (biennial) Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under 3745-65-75 (265.75)?

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE ONLY TO OFF-SITE TSDS.

3. Are manifests received by the facility signed and dated? Is one copy given to the transporter, one copy sent to the generator within 30 days and one copy kept for at least 3 years? [3745-65-71(A)] (265.71)

a. If shipping papers are used in lieu of manifests (bulk shipments, etc.), are the same requirements met [3745-65-71(B)] (265.71(b))?

b. Are any significant discrepancies in the manifest, as defined in 3745-65-72(A) (265.72(a)) noted in writing on the manifest document.

4. Have any manifest discrepancies been reconciled within 15 days as required by 3745-65-72(B) (265.72(b)) or has the o/o submitted the required information to the Director/Regional Administrator?

5. If the facility has accepted any unmanifested hazardous wastes from off-site sources for treatment, storage, or disposal, has an unmanifested waste report containing all the information required by 3745-65-76(A) (265.76) been submitted to the Director/Regional Administrator within 15 days?

(1) Indicated on Facility Annual Hazardous Waste Report

OAC 3745-66 CLOSURE AND POST-CLOSURE (40 CFR PART 265, SUBPART G)

		Y/N/NA	REMARK #
1.	Is a written closure plan on file at the facility which contains the following elements: [3745-66-12] (265.112)?	Y	
a.	A description of how each hazardous waste management unit will be closed in accordance with 265.111.		
b.	A description of how final closure will meet the requirements of 3745-66-11 (265.111).		
c.	An estimate of the maximum amount of hazardous waste ever in inventory.		
d.	A description of steps taken to remove or decontaminate facility equipment containment systems, structures, soils, and all hazardous waste residues.		
e.	The year closure is expected to begin and a schedule for the various phases of closure.		
f.	A description of other activities necessary to ensure closure with the performance standards including ground water monitoring, leachate collection, and run-off control.	NA	
2.	Has the closure plan (and post-closure plan, if applicable) been amended 60 days prior to any changes in facility design, processes, or closure dates or 60 days after an unexpected event occurs which affects the closure plan? [3745-66-12(C)] (265.112(C))	NA	
3.	Has the closure plan (and post-closure plan, if applicable) for surface impoundment, waste pile, land treatment or landfill units been submitted to the Director/Regional Administrator 180 days prior to beginning the closure process? [3745-66-12(D)] (265.112(d))	Y	
4.	Has the closure plan (and post-closure plan, if applicable) for tank, containers storage or incinerator units been submitted to the Director/Regional Administrator 45 days prior to beginning the closure process? [3745-66-12(D)] (265.112(d))	NA	

N/A

5. Within 90 days of receipt of the final volume of waste or Director's plan approval, if that is later, was all hazardous waste treated, removed, or disposed in accordance with the approved plan? [3745-66-13(A)] (265.113(a))
6. Was closure completed in accordance with the approved plan within 180 days after receipt of final volume of waste or approval of the plan, if that is later? [3745-66-13(B)] (265.113(b))
7. Did the owner/operator submit to the Director/Regional Administrator, within sixty (60) days after completion of closure, certification by both the owner/operator and an independent registered professional engineer that the facility has been closed in accordance with the approved closure plan? [3745-66-15] (265.115)
8. Did the owner/operator submit to the local zoning authority and the Director/Regional Administrator a survey plat in accordance with OAC 3745-66-16?
9. What permitted units at the facility have been closed in accordance with an approved Closure Plan?
10. If closure was partial, list the regulated units which remain in use at the facility:
11. If required, has the facility prepared a written post-closure plan? [3745-66-18] (265.118)
12. Does the post-closure plan include:
  - a. A description of proposed ground water monitoring?
  - b. A description of planned maintenance activities?
  - c. The name, address and phone number of person/office to contact during the post-closure period?

Y/N/NA    REMARK #

- |   |                   |              |
|---|-------------------|--------------|
| <p>13. For disposal facilities, has the owner/operator submitted to local land authorities and the Director a survey plat within 60 days after certification of closure? [3745-66-19] (265.119)</p> | <p><u>N/A</u></p> | <p>_____</p> |
| <p>14. Has the owner of the property on which a disposal unit is located recorded on the deed that:</p>   | <p>_____</p>      | <p>_____</p> |
| <p>a. The land has been used to manage hazardous waste and the type, quantity and location of waste?</p>  | <p>_____</p>      | <p>_____</p> |
| <p>b. Land use is restricted pursuant to 3745-66-17? [3745-66-19] (265.119)</p>   | <p>_____</p>      | <p>_____</p> |

OAC 3745-66 USE AND MANAGEMENT OF CONTAINERS (40 CFR PART 265, SUBPART I)

	<u>Y/N/NA</u>	<u>REMARK #</u>
1. Are hazardous wastes stored in containers which are:		
a. Closed [3745-66-73(A)] (265.173)?	*	(1)
b. In good condition [3745-66-71] (265.171)?	Y	
c. Compatible with the wastes stored in them [3745-66-72] (265.172)?	Y	
2. Are containers stored closed except when it is necessary to add or remove wastes? [3745-66-73(A)] (265.173(a))	*	(1)
3. Are hazardous waste containers stored, handled and opened in a manner which prevents container rupture or leakage? [3745-66-73(B)] (265.173(b))	Y	
4. Is the area where containers stored inspected for evidence of leaks or corrosion at least weekly? [3745-66-74] (265.174) [documentation of inspections required under 3745-65-15 for TSDs]	N	(2)
5. Are containers holding ignitable or reactive waste located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] (265.176)	Y	
6. Are containers holding hazardous wastes stored separately from other materials which may interact with the waste in a hazardous manner? [3745-66-77(C)] (265.177(c))	NA	

- (1) One drum of paint solids must be leveled off and closed up immediately
- (2) Inspections are not documented. No written record to show that inspections are conducted regularly.

OAC 3745-68 LANDFILLS (40 CFR PART 265, SUBPART N)

Y/N/NA REMARK #

1. General Operating Requirements. Does the facility provide the following:

- |    |   |            |                   |
|----|---|------------|-------------------|
| a. | Run-on control capable of handling a 24-hr, 25-yr storm?<br>[3745-68-02(A)] (265.302(a))  | <u>N</u>   | <u>          </u> |
| b. | Run-off control capable of handling a 24-hr, 25-yr storm?<br>[3745-68-02(B)] (265.302(b))   | <u>N</u>   | <u>          </u> |
| c. | If run-off is hazardous waste, is it managed in accordance with applicable rules? [3745-68-02(B)]   | <u>N</u>   | <u>          </u> |
| d. | Are facilities associated with run-on and run-off control systems managed to maintain design capacity after rain events? [3745-68-02(C)] (265.302(c)) | <u>N/A</u> | <u>(1)</u>        |
| e. | Control of wind dispersal of hazardous waste?<br>[3745-68-02(D)] (265.302(d))   | <u>N</u>   | <u>          </u> |

2. Surveying and Recordkeeping. Does the operating record include:  
[3745-68-09] (265.309) No operating record

- |    |  |          |                   |
|----|--|----------|-------------------|
| a. | A map showing the exact location and dimensions of each cell?<br>[3745-68-09(A)] (265.309(a))                                      | <u>y</u> | <u>(2)</u>        |
| b. | The contents of each cell and the location of each hazardous waste type within each cell? [3745-68-09(B)] (265.309(b))             | <u>N</u> | <u>(3)</u>        |
| 3. | Are ignitable or reactive wastes treated so the resulting mixture is no longer ignitable or reactive? [3745-68-12] (265.312(a)(b)) | <u>N</u> | <u>          </u> |

NOTE: IF WASTE IS RENDERED NON-REACTIVE OR NON-IGNITABLE, SEE TREATMENT REQUIREMENTS. IF NOT, THE PROVISIONS OF 3745-65-17 AND 3745-68-12(B) APPLY. (40 CFR 265.17(b))

- 50 -

- (1) There is no run-on/runoff control  
 (2) A map of the area has been drawn up according to NWDC supervisor's HNU screening  
 (3) Not yet defined

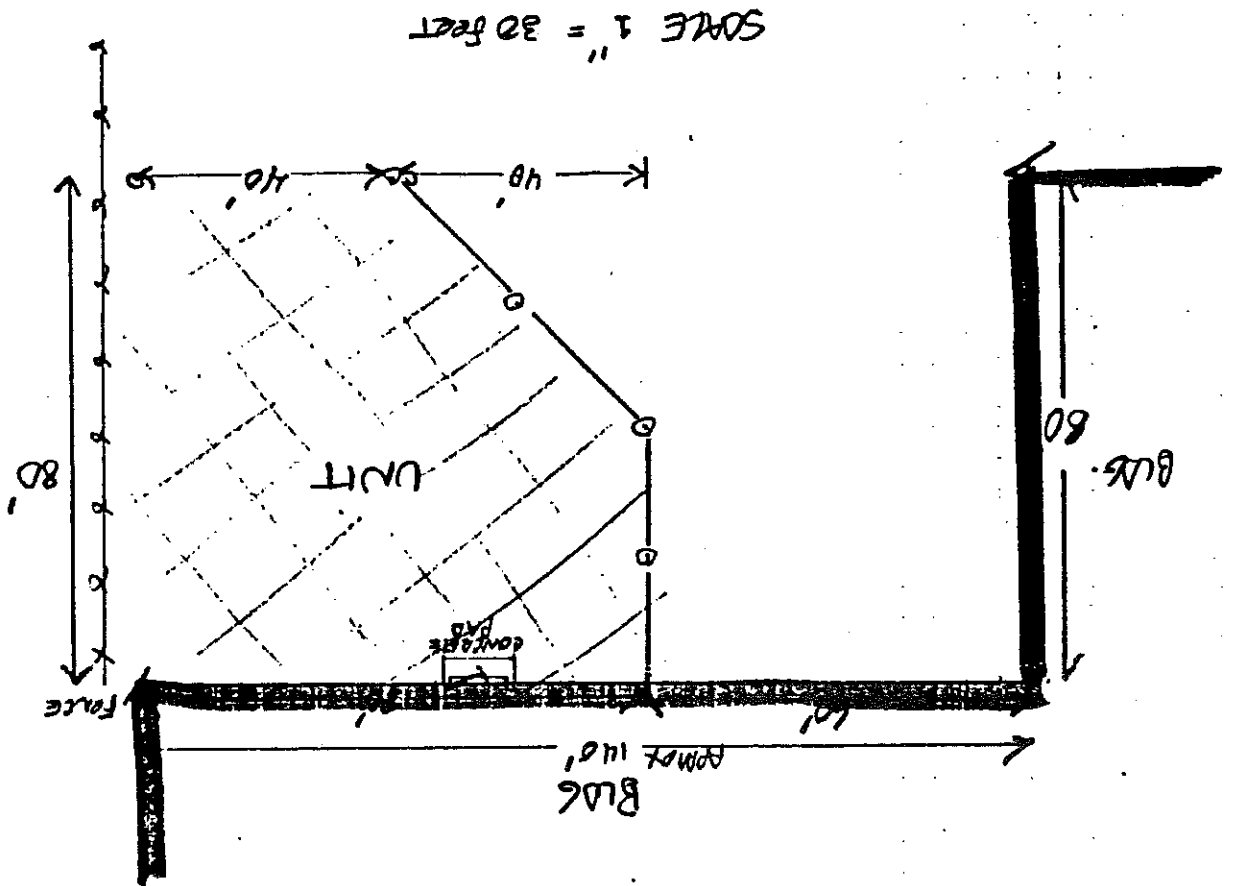
	Y/N/NA	REMARK #
4. Does the owner/operator dispose of incompatible wastes in separate cells? [3745-68-13] (265.313) If not, the provisions of 3745-68-15 apply. (265.17(b))	<u>N/A</u>	<u>          </u>
5. Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the landfill? [3745-68-15] (265.315)	<u>N/A</u>	<u>          </u>
6. Are containers at least 90% full prior to placement in the landfill? [3745-68-14(A)] (265.314(a))	<u>N/A</u>	<u>          </u>
7. Is bulk or non-containerized liquid waste or waste containing free liquids treated so that free liquids are not longer present. [3745-68-14(A)] (265.314(a))	<u>N</u>	<u>(4)</u>
8. Are containers other than lab packs, ampules, batteries or capacitors holding free liquids placed in the landfill? [3745-68-14(B)] (265.314(b)) If yes, has all free liquid been removed, absorbed or otherwise eliminated?	<u>N/A</u>	<u>          </u>
9. Has the owner/operator employed Method 9095 (Paint Filter Liquids Test) to demonstrate the absence of free liquids in containerized or bulk waste? [3745-68-14(D)] (265.314(d))	<u>          </u>	<u>          </u>
10. Are the special requirements for lab pack waste met? [3745-68-16] (265.316)	<u>N/A</u>	<u>          </u>
11. Is a written closure/post-closure plan available for inspection at the facility? [3745-66-12] (265.112)	<u>Y</u>	<u>(5)</u>
12. Has the closure/post-closure plan been amended 60 days prior to any changes in facility design, or operation, or no later than 60 days after an unexpected event has occurred which has effected the closure plan? [3745-66-18(D)] (265.118(d))	<u>N/A</u>	<u>          </u>

(4) In the past liquid waste paint, (solid paint dust) and solvents were dumped on the ground.  
 (5) Still under review, must be revised.

	Y/N/NA	REMARK #
13. Has the closure/post-closure plan been submitted to the Director/Regional Administrator 180 days prior to beginning closure? [3745-66-18(E)] (265.118(e))	<u>Y</u>	<u>      </u>
14. Does the plan contain information required in 3745-68-10? (265.310)	<u>N</u>	<u>(6)</u>
15. Is a closure cost estimate available?	<u>Y</u>	<u>      </u>
16. Has closure begun?	<u>N</u>	<u>      </u>
17. Has the property owner attached a notation to the property deed or other instrument which will notify any potential purchaser that the property has been used to manage hazardous waste and future use of the property is restricted under 3745-66-17(C) (265.117(c)) as required in 3745-66-19 (265.119(b))?	<u>N</u>	<u>      </u>

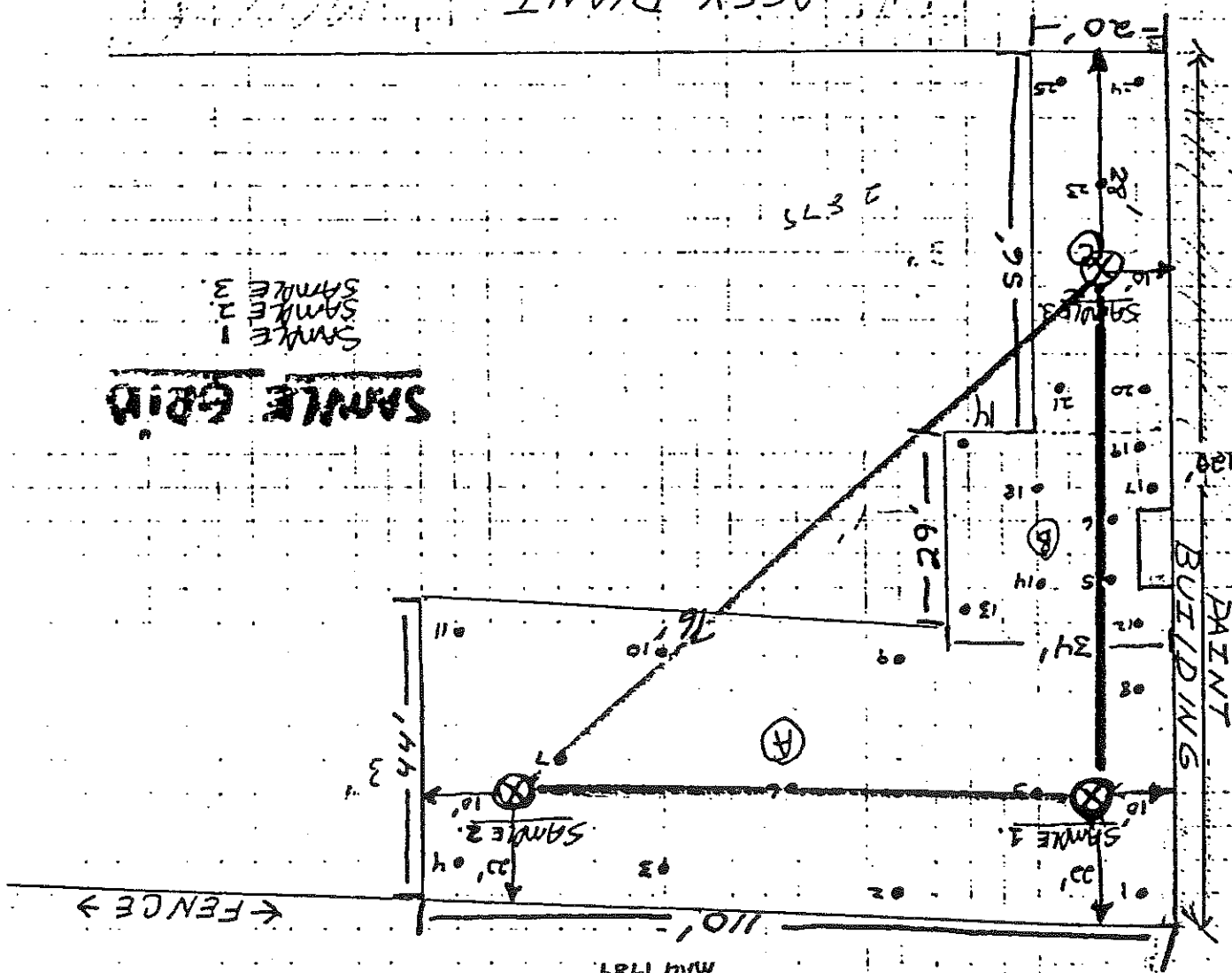
(6) Geologic and soil profiles and surface and sub-surface hydrology of the site not included in closure plan.

06-92-2 71207-7  
 CONL GUNNARSON



FRANK WHITE  
 and  
 WHITE, INC.  
 Feb 21, 1990

SOIL SAMPLE LOCATION MAP  
MAY 1989



**SAMPLE GRID**

SAMPLE 1  
SAMPLE 2  
SAMPLE 3

ASSY. PLANT

AREA

A = 4840	SF
B = 986	SF
C = 1120	SF
6446	SF

EST. TONS	YDS.	CUBIC FEET	CF.	DEPTH OF REMOVAL
1170	780	20,838	6946	1'
780	520	13,892	13,892	3'
390 TONS	260 YDS.			

# RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: Moritz, Inc.  
 U.S. EPA I.D. No. : OH0 982 218489  
 Street: 400 Park Avenue East  
 City: Mansfield State: Ohio Zip: 44905  
 Telephone: (419) 522-2323

Owner/Operator:

Street: \_\_\_\_\_  
 City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_  
 Telephone: \_\_\_\_\_

Inspection Date: 10/23/90 Time:     -    

Weather Conditions: Fair-Cool

	<u>Name</u>	<u>Agency/Title</u>	<u>Telephone</u>
Inspectors:	<u>Don North</u>	<u>Ohio EPA, NWAD</u>	<u>(419) 352-8461</u>

Facility Representative: \_\_\_\_\_

	<u>Generate</u>	<u>Transport</u>	<u>Treat</u>	<u>Store</u>	<u>Dispose</u>
F-Solvent	<u>✓</u>	<u>    </u>	<u>    </u>	<u>    </u>	<u>*</u>
Dioxin	<u>    </u>	<u>    </u>	<u>    </u>	<u>    </u>	<u>    </u>
California List	<u>    </u>	<u>    </u>	<u>    </u>	<u>    </u>	<u>    </u>
First Third	<u>    </u>	<u>    </u>	<u>    </u>	<u>    </u>	<u>    </u>
Second Third	<u>    </u>	<u>    </u>	<u>    </u>	<u>    </u>	<u>    </u>
Third Third	<u>✓</u>	<u>    </u>	<u>    </u>	<u>    </u>	<u>*</u>

\* The waste described throughout this report was dumped on the ground in back of the facility. A closure plan has been submitted but it still must be revised.

## INSPECTION SUMMARY

### Processes That Generate LIR Wastes

Monitz, Inc. fabricates horse and livestock trailers. In the past production was about 50 trailers each month. Currently, production is greatly reduced due to reduced demand. Therefore, waste generation is also greatly reduced (also due to recycling efforts). The process involves the shaping and welding of steel parts, preparing the trailers for painting by wiping down with solvent to clean, and spray painting the finished trailers.

Paint and solvent (0003) have been dumped behind the spray painting area of the facility. Because of this illegal disposal the facility is considered a "land disposal unit."

### ~~LIR Waste Management~~

Three different virgin solvents can be used to thin paint: 1. Xylene (also used to wipe down trailers prior to painting) all purpose solvent 2. Toluene - cold temperature painting 3. Hi Sol 10 - warm temperature painting (petroleum naphtha). The paint gun nozzles are cleaned (soaked) in Klean Strip, Spray-Gun Cleaner which consists of methylene chloride, cresols, xylene, phenols and potassium hydroxide or also in lacquer thinner. The dirty solvent is used to thin the primer. In the past the waste solvents and paint were dumped on the ground → later Co. shipped it off site → now added back to primer as a substitute for virgin material.

In the past the paint drying agent (additive) contained lead (0008). Therefore, the dried waste paint from the floor <sup>has been</sup> drummed and sent off - is currently the company does not use a lead based drying agent. Therefore, Summary very soon, when the old inventory is used up, they will no longer generate 0008.

Currently generate ~ 2 gal/wk of waste liquid paint. 506  
Kiker manufactures the new paint used.

Trailer Master Ltd. Co. has gone out of business. Trailers are now painted by Top Cat, Inc. which is run by Jim Boyd. Monitz leases the space to Top Cat, Inc. It also leased the space to Trailer Master which was owned by Maryanna and Donald Karr.

The xylene used to clean trailers will soon be replaced w/ Fantastic

Revised 10-20-89

RCRA LAND DISPOSAL RESTRICTION INSPECTION

WASTE IDENTIFICATION

1. Does the facility handle the following wastes?

a. F001 through F005 spent solvents

Yes ☒ No ☐ List\* Xylene

b. Dioxin-containing Wastes

Yes ☐ No ☐ List\* \_\_\_\_\_

c. California List Wastes

Yes ☐ No ☐ List\* \_\_\_\_\_

d. First and <sup>Third</sup> ~~Second~~ Third Wastes

Yes ☒ No ☐ List\* Lead (paint) Poos

\* List wastes if room allows or attach Appendix A.

Note: Please be aware of potential misclassification of wastes (i.e., California list/"soft hammer"/characteristic waste applicabilities).

2. Does the facility handle the following wastes (national capacity variances)?

a. F001 - F005 contaminated soil or debris resulting from a CERCLA response action or RCRA corrective action (effective date — 11/08/90).

Yes ☐ No ☐ Comments \_\_\_\_\_

b. Dioxin contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (effective date — 11/08/90).

Yes ☐ No ☐ Comments \_\_\_\_\_

c. California list contaminated soil or debris resulting from a CERCLA response action or a RCRA corrective action (effective date — 11/08/90).

Yes ☐ No ☐ Comments \_\_\_\_\_

N/A

- d. First Third wastes with the following waste codes: K048, K049, K050, K051, K052, or K071 (effective date - 08/08/90).

Yes \_\_\_ No \_\_\_ Comments \_\_\_\_\_

- e. First Third contaminated soil and debris which have a treatment standard based on incineration - K016, K018, K019, K020, K022, K024, K030, K037, K048-K052, K086, K087, K101, K102, K103, and K104 (effective date - 08/08/90).

Yes \_\_\_ No \_\_\_ Comments \_\_\_\_\_

- f. Second Third contaminated soil and debris which have a treatment standard based on incineration - F010, F024, K009, K010, K011, K013, K014, K023, K027, K028, K029, K038, K039, K040, K043, K093, K094, K095, K096, K113, K114, K115, K116, P039, P040, P041, P043, P044, P062, P071, P085, P089, P094, P097, P109, P111, U028, U058, U069, U087, U088, U102, U107, U109, U221, U223, U235 (effective date - 06/08/91).

Yes \_\_\_ No \_\_\_ Comments \_\_\_\_\_

## RCRA LAND DISPOSAL RESTRICTION INSPECTION

## GENERATOR CHECKLIST

## GENERATOR REQUIREMENTS

A. Treatability Group - Treatment Standards Identification

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

Yes ☒ No ☐ NA ☐

If yes, check the appropriate treatability group.

☐ Wastewaters containing solvents (less than or equal to 1% total organic carbon (TOC) by weight)  
☒ All other spent solvent wastes

2. First and ~~Second~~ <sup>Third</sup> Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

Yes ☒ No ☐ NA ☐

If yes, list the waste code and check the correct treatability group.

Waste Code	Wastewater*	Non-wastewater
D008	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

\* Less than 1% TOC by weight and less than 1% filterable solids.

3. California List Wastes: Has the generator correctly identified the required treatment technology [268.42]?

- a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

Yes ☐ No ☐ NA ☐

If yes, specify the method: \_\_\_\_\_

- b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated [40 CFR 761.70] or disposed of by other approved alternate methods [40 CFR 761.60(e)]?

Yes \_\_\_ No \_\_\_ NA \_\_\_

If an alternative method is used, specify the method and state whether the facility has received approval from the Regional Administrator or Director, Exposure Evaluation Division, for an exemption from the incineration requirement:

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- c. For hazardous waste that contains halogenated organic compounds (HOCs) in total concentrations greater than or equal to 1,000 mg/L or 1,000 mg/Kg (except dilute HOC wastewater), is the waste incinerated in accordance with existing requirements of 40 CFR Part 264 Subpart O or 40 CFR Part 265 Subpart O?

Yes \_\_\_ No \_\_\_ NA \_\_\_

4. Does the generator mix restricted wastes with different treatment standards?

Yes \_\_\_ No ☒ Comments \_\_\_\_\_

If yes, did the generator select the most stringent treatment standards (268.41(b), 268.43(b))?

Yes \_\_\_ No \_\_\_ Comments \_\_\_\_\_

#### B. Waste Analysis

1. Does the generator determine whether the restricted waste exceeds treatment standards or prohibition levels at the point of generation by:

- Knowledge of waste Yes ☒ No \_\_\_

List the wastes for which "applied knowledge" was used and describe the basis of the applied knowledge determination.

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Was all supporting data retained on-site, [268.7(a)(5)]?

Yes \_\_\_ No \_\_\_

- TCLP Yes \_\_\_ No \_\_\_ NA \_\_\_

List the wastes for which TCLP was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- Total constituent analysis Yes \_\_\_ No \_\_\_ NA \_\_\_

List the wastes for which total constituent analysis was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- pH  $\leq$  2 Yes \_\_\_ No \_\_\_ NA \_\_\_

List the wastes for which pH testing was used.

\_\_\_\_\_

- Paint Filter Liquid Test Yes \_\_\_ No \_\_\_ NA \_\_\_

List the wastes for which PFLT was used.

\_\_\_\_\_

2.. Does the facility dilute the restricted waste as a substitute for adequate treatment [268.3]?

Yes \_\_\_ No ☒ NA \_\_\_

### C. Management

#### 1. On-Site Management

Is restricted waste treated, stored for greater than 90 days, or disposed on-site?

yes ☒ No \_\_\_ Comments *\* Waste was dumped in past. Region II already notified. Closure plan is being revised.*

If yes, the TSD Checklist must be completed.

## 2. Off-Site Management

- a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

Yes ☒ No ☐ (If no, go to b)

If yes, identify waste code and off-site treatment or storage facilities:

Waste Code	Facilities	Treat/Store
F001	NorthEast Chemical Corp	treat
D008	3301 Monroe Ave	treat
	Cleveland, Ohio 44113	
	(216) 961-8618	

- Does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

Yes ☒ No ☐

- Does notification contain the following? *attached*

EPA Hazardous waste number(s) Yes ☒ No ☐

Applicable treatment standards and prohibition levels Yes ☐ No ☒

Manifest number Yes ☒ No ☐

Waste analysis data, if available Yes ☐ No ☐

- b. Does the facility ship any waste that meets the treatment standards to an off-site disposal facility?

Yes ☐ No ☒ (If no, go to c)

If yes, identify waste code and off-site disposal facilities:

Waste Code	Facility

**NORTH EAST CHEMICAL CORPORATION  
GENERATOR'S NOTIFICATION OF LAND DISPOSAL RESTRICTION**

GENERATOR NAME TRAILER MASTER Ltd. Co.  
GENERATOR I.D. NO. DHD 982218 489 NEC NO. 8296  
MANIFEST NO. 10590 LINE: ☐ 11A ☒ 11B ☐ 11C ☐ 11D  
EPA WASTE CODES: D001 / D008

Refer to the back side of this sheet for a list of Waste Codes accepted by North East Chemical Corporation. These codes are grouped according to the applicable restriction.

1. Wastes subject to treatment standards expressed as Constituent Concentration in Waste Extract (CCWE) under 40 CFR 268.41:  
☐ CCWE exceeds treatment standard  
☐ Waste has been treated to below CCWE standard (attach analytical data)
2. Wastes subject to treatment standards expressed as specified technologies under 40 CFR 268.42:  
☐ Wastewaters ☒ Non-wastewaters
3. Wastes subject to treatment standards expressed as Constituent Concentration in Waste (CCW) under 40 CFR 268.43 for:  
☐ Wastewaters (3a) ☐ Non-wastewaters (3b)  
☐ CCW exceeds treatment standard  
☐ Waste has been treated to below CCW standard (attach analytical data)

**Exemptions from Land Disposal Restrictions (check if applicable):**

- ☐ This waste is subject to a nationwide capacity extension under 40 CFR 268 Subpart C.
- ☐ This waste is subject to a case-by-case extension under 40 CFR 268.5.
- ☐ This waste is subject to a treatability variance under 40 CFR 268.44.
- ☐ This waste is subject to a "No Migration Exemption" under 40 CFR 268.6.

I certify under penalty of law that I am personally familiar with the above waste through testing and analysis, or through knowledge of the waste, and that the information I have supplied on this certification is true and complete to the best of my knowledge.

Signed: James V. Boyd Date: 10/5/90  
Name: JAMES A. BOYD Title: Plant Mgr.

(See reverse for listing of hazardous wastes accepted by NEC)

NORTH EAST CHEMICAL CORPORATION  
GENERATOR'S NOTIFICATION OF LAND DISPOSAL RESTRICTION

GENERATOR NAME TRAILER MASTER Ltd Co.  
GENERATOR I.D. NO. OHD 982218489 NEC NO. 710  
MANIFEST NO. 10590 LINE: ☒ 11A ☐ 11B ☐ 11C ☐ 11D  
EPA WASTE CODES: F003 D001

Refer to the back side of this sheet for a list of Waste Codes accepted by North East Chemical Corporation. These codes are grouped according to the applicable restriction.

1. Wastes subject to treatment standards expressed as Constituent Concentration in Waste Extract (CCWE) under 40 CFR 268.41:
  - ☒ CCWE exceeds treatment standard
  - ☐ Waste has been treated to below CCWE standard (attach analytical data)
2. Wastes subject to treatment standards expressed as specified technologies under 40 CFR 268.42:
  - ☐ Wastewaters
  - ☒ Non-wastewaters
3. Wastes subject to treatment standards expressed as Constituent Concentration in Waste (CCW) under 40 CFR 268.43 for:
  - ☐ Wastewaters (3a) ☐ Non-wastewaters (3b)
  - ☐ CCW exceeds treatment standard
  - ☐ Waste has been treated to below CCW standard (attach analytical data)

Exemptions from Land Disposal Restrictions (check if applicable):

- ☐ This waste is subject to a nationwide capacity extension under 40 CFR 268 Subpart C.
- ☐ This waste is subject to a case-by-case extension under 40 CFR 268.5.
- ☐ This waste is subject to a treatability variance under 40 CFR 268.44.
- ☐ This waste is subject to a "No Migration Exemption" under 40 CFR 268.6.

I certify under penalty of law that I am personally familiar with the above waste through testing and analysis, or through knowledge of the waste, and that the information I have supplied on this certification is true and complete to the best of my knowledge.

Signed: James G. Boyd Date: 10/5/90  
Name: JAMES G. BOYD Title: Plant Mgr.

- Does the facility provide notification and certification to the disposal facility [268.7(a)(2)]?

Yes \_\_\_ No \_\_\_

- Does notification contain the following?

EPA Hazardous waste number(s) Yes \_\_\_ No \_\_\_

Applicable treatment standards and prohibition levels Yes \_\_\_ No \_\_\_

Manifest number Yes \_\_\_ No \_\_\_

Waste analysis data, if available Yes \_\_\_ No \_\_\_

Certification that the waste meets treatment standards [wording in 268.7(a)(2)(ii)] Yes \_\_\_ No \_\_\_

- ☒ c. Is the waste subject to a nationwide variance, case-by-case extension (268.5), or no migration petition (268.6).

Yes \_\_\_ No \_\_\_ (If no, go to d)

- If yes, does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal [268.7(a)(3)]?

Yes \_\_\_ No \_\_\_

- Does the notification contain the following information?

EPA hazardous waste number Yes \_\_\_ No \_\_\_

The corresponding treatment standards and all applicable prohibitions Yes \_\_\_ No \_\_\_

Manifest number Yes \_\_\_ No \_\_\_

Waste analysis data, if available Yes \_\_\_ No \_\_\_

Date the waste is subject to the prohibitions Yes \_\_\_ No \_\_\_

- ☒ d. Does the facility generate any First or Second Third "soft hammer" waste?

Yes \_\_\_ No \_\_\_ (If no, go to 4)

- Does the generator provide the following notification to the receiving facility with each shipment of waste [268.7(a)(4)]?

(i)	EPA hazardous waste number	Yes ____	No ____
(ii)	Applicable prohibition [268.33(f), 268.34(h)]	Yes ____	No ____
(iii)	Manifest number	Yes ____	No ____
(iv)	Waste analysis data, if available	Yes ____	No ____

3. "Soft Hammer" Demonstrations/Certifications

- a. Are any "soft hammer" wastes or treatment residues destined for ultimate disposal in a landfill or surface impoundment?

Yes \_\_\_\_ No \_\_\_\_

- b. Has the generator attempted to locate and contract with treatment and recovery facilities that provide treatment that yields the greatest environmental benefit [268.8(a)(1)]?

Yes \_\_\_\_ No \_\_\_\_

- c. Has the generator submitted a demonstration and certification to the Regional Administrator to document its efforts to locate practically available treatment [268.8(a)(2)]?

Yes \_\_\_\_ No \_\_\_\_

- If yes, did the generator submit the documentation and certification prior to first shipment?

Yes \_\_\_\_ No \_\_\_\_

- d. Does the demonstration contain the following information?

A list of facilities and facility officials contacted?	Yes ____	No ____
--	----------	---------

Addresses	Yes ____	No ____
-----------	----------	---------

Telephone numbers	Yes ____	No ____
-------------------	----------	---------

Contact dates	Yes ____	No ____
---------------	----------	---------

Certification statement	Yes ____	No ____
-------------------------	----------	---------

Attach a copy of the demonstration and certification.

- e. If there is no practically available treatment, has the generator included with the demonstration, a written discussion of why the generator was not able to obtain treatment or recovery for that waste [268.8(a)(2)(i)]?

Yes ☐ No ☐ NA ☐

If yes, attach a copy of written discussion.

- f. Does the generator ship its "soft hammer" waste off-site for treatment?

Yes ☐ No ☐

Describe the type of treatment and treatment facilities:

<u>Waste Code</u>	<u>Type of Treatment</u>	<u>Treatment Facility</u>
<hr/>	<hr/>	<hr/>
<hr/>	<hr/>	<hr/>
<hr/>	<hr/>	<hr/>

- g. Did the generator send a copy of its demonstration and certification to the receiving facility with the first shipment of waste?

Yes ☐ No ☐

- h. Does the generator provide certification with each subsequent shipment of wastes to receiving facilities?

Yes ☐ No ☐ NA ☐

#### 4. Records Retention

Does the facility retain on-site copies of all notifications, demonstrations, and certifications for a period of 5 years [268.7(a)(6)]?

Yes ☒ No ☐ Comments 

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D. RCRA Corrective Action and CERCLA Response Action Waste

1. Has the facility disposed of contaminated soil and debris from a RCRA corrective action or a CERCLA response action in a landfill or surface impoundment?

Yes \_\_\_ No \_\_\_ Comments \_\_\_\_\_

2. Did the unit meet the minimum technology requirements (double liner, leachate collection system, and ground-water monitoring)?

Yes \_\_\_ No \_\_\_ NA \_\_\_ Comments \_\_\_\_\_

E. Treatment Using RCRA 264/265 Exempt Units or Processes

1. Is waste treated in RCRA 264/265 exempt units (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)?

Yes \_\_\_ No \_\_\_

List types of waste treatment units and processes:

<u>Waste Code</u>	<u>Type of Treatment</u>	<u>Treatment Units and Processes</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____

2. Are treatment residuals generated from these units?

Yes \_\_\_ No \_\_\_ Comments \_\_\_\_\_

If yes, the residues are subject to the LDR generator requirements.

3. Are these residuals further treated, stored for greater than 90 days, or disposed on-site?

Yes \_\_\_ No \_\_\_ NA \_\_\_ Comments \_\_\_\_\_

If yes, the TSD checklist must be completed.

N/A

## RCRA LAND DISPOSAL RESTRICTION INSPECTION

## TRANSPORTER CHECKLIST

## TRANSPORTER REQUIREMENTS

- A. Does the transporter accumulate waste for more than 10 days [268.50(a)(3)]?

Yes \_\_\_ No \_\_\_

If yes, check the appropriate regulatory status:

\_\_\_ Interim status for storage  
\_\_\_ RCRA permit for storage

If no, describe inventory controls to ensure that wastes are not stored for more than 10 days:

---

---

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- B. Does the transporter mix, combine, or recontainerize wastes?

Yes \_\_\_ No \_\_\_

If yes, list the restricted wastes that have been mixed.

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- C. Is the waste treated in an exempt treatment process on-site?

Yes \_\_\_ No \_\_\_

## RCRA LAND DISPOSAL RESTRICTION INSPECTION

## TSD CHECKLIST

\* These pages will reflect past TSD activity not yet cleaned up.

## TSD REQUIREMENTS

A. General Facility Standards

1. Does the waste analysis plan cover Part 268 requirements [264/265.13]?

F-solvent  
(TCLP)\*

Yes \_\_\_ No \_\_\_ NA \_\_\_

No waste analysis plan

Dioxin  
(TCLP)

Yes \_\_\_ No \_\_\_ NA \_\_\_

California List  
(PFLT and/or total constituent analysis)\*

Yes \_\_\_ No \_\_\_ NA \_\_\_

First & Second Third  
(TCLP and/or total constituent analysis)

Yes \_\_\_ No \_\_\_ NA \_\_\_

\* TCLP= Toxicity Characteristic Leaching Procedure (268, App. I)  
PFLT= Paint Filter Liquids Test (SW-846)

2. Does the facility obtain representative chemical and physical analyses of wastes and residues?

Yes \_\_\_ No \_\_\_

Comments

Knowledge applied to waste characterization presently. However, waste dumped on ground in past

- a. What date was the waste analysis plan last revised?

\_\_\_\_\_

- b. Are analyses conducted on-site or off-site?

\_\_\_ On-site \_\_\_ Off-site

Identify off-site lab: \_\_\_\_\_

\_\_\_\_\_

- c. Are F-solvent and dioxin containing waste analyzed using TCLP?

Yes \_\_\_ No \_\_\_ NA \_\_\_

- d. Are California List wastes analyzed using the appropriate analytical method (PFLT filtrate for metals and cyanide; total constituent analysis for corrosive wastes, PCBs and halogenated organic compounds (HOCs).

Yes \_\_\_ No \_\_\_ NA \_\_\_

- e. Are First Third and Second Third wastes analyzed using the appropriate analytical method for the specified BDAT\* (i.e., total constituent analysis for destruction technologies and TCLP for stabilization/fixation technologies)? See Appendix B.

Yes \_\_\_ No \_\_\_ NA \_\_\_

\* BDAT= best demonstrated available technology

3. Are the operating records, including analyses and quantities, complete [264/265.73]? *No operating records*

Yes \_\_\_ No \_\_\_

4. Do operating records contain copies of the notification, certification, and demonstration (if applicable) from the generator? Records must be kept until closure of unit.

Yes \_\_\_ No \_\_\_ Comments \_\_\_\_\_

B. Storage (268.50)

1. Are prohibited wastes\* stored on-site?

Yes \_\_\_ No \_\_\_ (If no, go to C, Treatment.)

\* Prohibited wastes are a subset of restricted wastes, i.e., they are those restricted wastes that are currently ineligible for land disposal [53 FR 31208, August 17, 1988].

2. If yes, identify storage unit.

\_\_\_\_ Tanks  
 \_\_\_\_ Containers  
 \_\_\_\_ Other (Identify inappropriate storage unit(s)). \_\_\_\_\_

3. Are all containers clearly marked to identify the contents and date(s) entering storage [268.50(a)(2)]?

Yes \_\_\_ No \_\_\_ NA \_\_\_

WIA

TSD

4. Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage (264/265.73)?

Yes \_\_\_ No \_\_\_

5. Do operating records agree with container labeling [268.50(a)(2) and 264/265.73]?

Yes \_\_\_ No \_\_\_ NA \_\_\_

6. Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

Yes \_\_\_ No \_\_\_ NA \_\_\_

If yes, do the operating records show that the volume of waste removed from tanks annually equals or is greater than the tank volume?

Yes \_\_\_ No \_\_\_

7. Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record [268.50(a)(2)]?

Yes \_\_\_ No \_\_\_ NA \_\_\_

8. Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect [268.50(c)]?

Yes \_\_\_ No \_\_\_ NA \_\_\_

If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?

Yes \_\_\_ No \_\_\_ NA \_\_\_

If yes, state how: \_\_\_\_\_

\_\_\_\_\_

9. Has liquid hazardous waste containing PCBs at concentrations greater than or equal to 50 ppm being stored:

- a. In a facility meeting the TSCA criteria in 761.65(b)?

Yes \_\_\_ No \_\_\_ NA \_\_\_

- b. More than one year [268.50(f)]?

Yes \_\_\_ No \_\_\_ NA \_\_\_

NIA

TSD

C. Treatment

1. Does the facility treat restricted wastes other than in surface impoundments?

Yes \_\_\_ No \_\_\_ (If no, go to D, Surface Impoundments.)

2. Describe the waste codes and treatment processes:

<u>Waste Code</u>	<u>Treatment Processes</u>
_____	_____
_____	_____
_____	_____

3. Was dilution used as a substitute for treatment [268.3]?

Yes \_\_\_ No \_\_\_ Comments \_\_\_\_\_

4. Does the facility, in accordance with an acceptable waste analysis plan, test the residue from all treatment processes [268.7(b)]?

Yes \_\_\_ No \_\_\_ Comments \_\_\_\_\_

Have treatment standards or prohibition levels been met?

Yes \_\_\_ No \_\_\_ Comments \_\_\_\_\_

5. Does the facility ship any waste or treatment residue to an off-site disposal facility?

Yes \_\_\_ No \_\_\_ NA \_\_\_

If yes, does the treatment facility provide notification and certification to the disposal facility [268.7(b)(4) and (5)]??

Yes \_\_\_ No \_\_\_ (If yes, the Generator portion of the checklist must be completed.)

6. If the waste or treatment residue will be further managed at a different treatment or storage facility, has the facility complied with the generator notice and certification requirements [268.7(a)]?

Yes \_\_\_ No \_\_\_

N/A

TSD

7. Does the facility treat "soft hammer" wastes?

Yes \_\_\_ No \_\_\_ (If no, go to 8.)

a. If yes, is the waste treated in accordance with the generator's certification/demonstration [268.8(c)(1)]?

Yes \_\_\_ No \_\_\_

b. Did the treatment facility certify that the "soft hammer" waste was treated in accordance with the generator's demonstration, [268.8(c)(1)]?

Yes \_\_\_ No \_\_\_

8. Does the facility ship any "soft hammer" waste to an off-site treatment, recovery, disposal or storage facility?

Yes \_\_\_ No \_\_\_ NA \_\_\_

If yes, does the treatment facility send a copy of the generator's "soft hammer" demonstration and certification to the receiving treatment, recovery, disposal or storage facility along with its treatment certification [268.8(c)(2)]?

Yes \_\_\_ No \_\_\_ NA \_\_\_

Identify waste codes and off-site facilities:

<u>Waste Code</u>	<u>Facility</u>
_____	_____
_____	_____
_____	_____
_____	_____

9. Are notifications, demonstrations, certifications (if applicable), and results of waste analysis prepared by the generators, kept in the operating record until facility closure [264/265.73(b)]?

Yes \_\_\_ No \_\_\_

N/A

TSD

D. Surface Impoundments

1. Are prohibited wastes placed in surface impoundments for treatment?  
Yes \_\_\_ No \_\_\_ List \_\_\_\_\_ (If no, go to E, Land Disposal.)
2. Are evaporation or dilution the only recognizable treatment occurring in the surface impoundment?  
Yes \_\_\_ No \_\_\_
3. Did the facility submit to the Agency, the waste analysis plan, as well as, the certification of compliance with minimum technology and ground-water monitoring requirements?  
Yes \_\_\_ No \_\_\_
4. If the minimum technology requirements have not been met, has a waiver been granted for that unit?  
Yes \_\_\_ No \_\_\_ NA \_\_\_
5. Have the Subpart F groundwater monitoring requirements been met?  
Yes \_\_\_ No \_\_\_ NA \_\_\_
6. Are representative samples of the sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan?  
Yes \_\_\_ No \_\_\_  
Attach test results.
7. Do the hazardous waste residues (sludges or liquids) exceed the treatment standards specified in 40 CFR 268, or where no treatment standards are established for a waste, the applicable prohibition levels?  
Sludge Yes \_\_\_ No \_\_\_ Waste Code \_\_\_\_\_  
Supernatant Yes \_\_\_ No \_\_\_ Waste Code \_\_\_\_\_
8. Provide the frequency of analyses conducted on treatment residues:  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

N/A

TSD

9. Does the operating record adequately document the results of waste analyses performed in accordance with 40 CFR 268?

Yes \_\_\_ No \_\_\_

10. Are sludge residues that exceed the treatment standards and/or prohibition levels removed adequately on an annual basis?

Yes \_\_\_ No \_\_\_ Comments \_\_\_\_\_

- a. Are adequate precautions taken to protect liners, and do records indicate that liner integrity is inspected?

Yes \_\_\_ No \_\_\_

- b. Are residues subsequently managed in another surface impoundment?

Yes \_\_\_ No \_\_\_

- c. Are residues treated prior to disposal?

Yes \_\_\_ No \_\_\_ Comments \_\_\_\_\_

If yes, are waste residues treated on-site or off-site?

On-site \_\_\_\_\_ Off-site \_\_\_\_\_

Identify waste code and treatment method:

<u>Waste Code</u>	<u>Treatment Method</u>
_____	_____
_____	_____
_____	_____

11. If supernatant is determined to exceed treatment standards, is annual throughput greater than impoundment volume?

Yes \_\_\_ No \_\_\_ Comments \_\_\_\_\_

E. Land Disposal

1. Are restricted and/or prohibited wastes <sup>were placed</sup> placed in land disposal units such as landfills, surface impoundments, waste piles, land treatment units, salt domes/beds, mines/caves, concrete vaults, or bunkers?

Yes ☒ No ☐

Note: Do not include surface impoundments addressed in D, Surface Impoundments.

If yes, specify which units and what wastes each unit has received:  
80' X 80' land disposal unit behind the paint booth area  
of plant.

2. Does the facility's operating record contain notices, certifications, and "soft hammer" demonstrations from generators/storers/treaters? These records must be maintained until facility closure.

Yes ☐ No ☒ <sup>waste</sup> illegally disposed

3. Does the facility obtain waste analysis data or test the wastes (according to the waste analysis plan) to determine that the wastes comply with the applicable treatment standards [268.7(c)]?

Yes ☐ No ☒ waste was illegally disposed

If yes, at what frequency? \_\_\_\_\_

4. If prohibited wastes that exceed the treatment standards are placed in land disposal units (excluding wastes subject to national capacity variances) [268.30(a)], does the facility have an approved waiver based on no migration petition [268.6], an approved case-by-case capacity extension [268.5], or variance from treatment standards [268.44]?

Yes ☐ No ☒

5. Does the facility dispose of restricted wastes that are subject to a national capacity variance or the "soft hammer" provisions?

Yes ☐ No ☒ Comments \_\_\_\_\_

If yes, have the minimum technology requirements been met for all units receiving such wastes?

Yes ☐ No ☐

6. Does the facility have notices [268.7(a)(3)] and records for disposed wastes that are subject to national capacity variances, case-by-case extensions [268.5], no migration petitions [268.6], or a variance from treatment standards?

Yes \_\_\_ No \_\_\_ NA ☒

7. If the facility has a case-by-case extension, is the facility making progress as described in progress reports?

Yes \_\_\_ No \_\_\_ NA ☒

8. Are restricted wastes placed in underground injection wells?

Yes \_\_\_ No ☒ List \_\_\_\_\_





State of Ohio Environmental Protection Agency

Northwest District Office

1035 Deviac Grove Drive

Bowling Green, Ohio 43402-4598

(419) 352-8461 FAX (419) 352-8468

Richard F. Celeste  
Governor

RE: Richland County  
Moritz, Incorporated  
OHD 982218489  
Hazardous Waste

RECEIVED  
OHIO EPA

January 10, 1991

JAN 11 1991

CERTIFIED MAIL

DIV. of SOLID & HAZ. WASTE MGT

Mr. Jim Boyd  
Moritz, Incorporated  
400 Park Avenue East  
Mansfield, Ohio 44905

Dear Mr. Boyd:

A hazardous waste inspection was conducted by the Ohio EPA at Moritz, Inc., 400 Park Avenue East, Mansfield, Ohio, in the presence of Frank Moritz and Tom Moritz on October 23, 1990, and in the presence of yourself on October 29, 1990. The purpose of the inspection is to assess the company's compliance with state regulations applicable to a hazardous waste generator and treatment, storage, and disposal facility.

Chapter 3734.02(F) of the Ohio Revised Code states in part that "No person shall store, treat, or dispose of hazardous waste identified or listed under this chapter and rules adopted under it, regardless of whether generated on or off the premises where the waste is stored, treated, or disposed of...except at or to any of the following: (1) A hazardous waste facility operating under a permit in accordance with this chapter...".

- A. Moritz, Inc. stored hazardous waste xylene and xylene still bottoms (F003) for greater than 180 days without a hazardous waste storage permit. The off-site shipment of 14 drums of mixed xylene and paint waste occurred on October 26, 1988. The next off-site shipment of 18 drums of mixed xylene and paint waste did not occur until February 16, 1990, almost 16 months later. A distillation unit was used during a portion of this 16-month period. Hazardous waste xylene still bottoms (F003) were added to the floor sweeping drums, according to yourself. The floor sweepings are paint waste which is hazardous due to the presence of lead (D008).

Mr. Jim Boyd  
January 10, 1990  
Page Two

- B. Moritz, Inc. stored additional hazardous waste xylene and xylene still bottoms (F003) for greater than 180 days without a hazardous waste storage permit. Specifically, the Ohio EPA Special Investigation Section confirmed in a complaint investigation on September 28, 1990, that at least 16, 55-gallon drums of hazardous waste xylene (F003) and at least 10, 55-gallon drums of hazardous waste paint (D001 and D008) were inventoried in storage near the north loading dock at the facility. These drums were not observed by me during the October inspection of the facility, even though I clearly explained that I needed to observe all hazardous waste activity. Furthermore, a review of all of the hazardous waste manifests completed by Moritz, Inc. (Trailer Master), according to you, did not indicate that these hazardous wastes were properly sent off-site to a permitted treatment, storage, or disposal facility prior to my October inspection. Therefore, Moritz, Inc. must provide the Ohio EPA with documentation that this hazardous waste has been properly sent off-site, within 10 days.
- C. Moritz, Inc. stored hazardous waste dried paint mixed with hazardous waste xylene still bottoms (D008 and F003) for greater than 180 days without a hazardous waste storage permit. The Ohio EPA first conducted an inspection of Moritz, Inc. on May 7, 1987, and noted unpermitted on-site land disposal in a letter dated May 22, 1987. At that point in time, Moritz, Inc. should have ceased the land disposal of the hazardous waste dried paint (D008).

However, this waste was not shipped off-site until June 8, 1990, 36 months later, when 15 drums were sent to North East Chemical Corporation. You explained that until June 8, 1990, this waste was stored in the painting area in buckets and drums. Though listed hazardous waste xylene still bottoms were commingled with the dried paint containing lead, the manifest only listed the characteristic of ignitability (D001). Therefore, Moritz, Inc. must provide the locations of the distillation unit, the past locations of the containers of dried paint floor sweepings, and the past locations of waste xylene storage on a facility map, within 10 days.

Due to unpermitted storage of hazardous waste, Moritz, Inc. must submit a closure plan for the waste solvent storage areas and the waste dried paint storage areas within 60 days. The closure plan must include all applicable requirements of OAC Rules 3745-66-10 through 3745-66-20. Three copies of the closure plan must be submitted to the Director of the Ohio EPA at P.O. Box 1049, Columbus, Ohio, 43266-0149.

Mr. Jim Boyd  
January 10, 1990  
Page Three

The following violations of Ohio's hazardous waste regulations were noted as a result of the inspection:

1. OAC Rule 3745-52-34(D)(5)(b) Moritz, Inc. does not post the following information by the telephone: the name and telephone number of the emergency coordinator; the location of fire extinguishers and spill control material; and, if present, fire alarm(s).

As the owner/operator of a hazardous waste storage and disposal facility, Moritz, Inc. is subject to the applicable rules in Chapters 3745-65 through 3745-69 of the Ohio Revised Code.

2. OAC Rule 3745-65-13 Moritz, Inc. does not have a detailed chemical and physical analysis of all its waste material which contains all the information necessary to properly treat, store, or dispose of the waste. Moritz, Inc. also does not have a written waste analysis plan. The written waste analysis plan must include, but not be limited to: (a) parameters for analysis and the rationale for the selection of these parameters; (b) sampling methods; (c) analytical methods; and (d) frequency of analysis.
3. OAC Rule 3745-65-15 Moritz, Inc. does not have a written inspection plan and has not documented required inspections. Such a written plan must be developed and kept on-site. Inspections must be recorded in a log for at least three years.

The written inspection plan shall include, but not be limited to: (a) the types of problems to be looked for; (b) condition of safety and emergency equipment, security devices, and operating and structural equipment; (c) the operation of satellite accumulation areas; (d) proper drum labeling; (e) proper management of the drum storage area (behind the paint area); and (f) proper management of the land disposal unit. Areas subject to spills, such as the drum storage area when drums are added to it, shall be inspected daily when this occurs.

The inspection log shall include, but not be limited to: (a) the date and time of the inspection; (b) the name of the inspector; (c) a notation of the observations made; and (d) the date and nature of any repairs or remedial actions.

4. OAC Rule 3745-65-16 Moritz, Inc. does not have a written personnel training program. Such a training program shall include, but not be limited to: (a) procedures for using,

Mr. Jim Boyd  
January 10, 1990  
Page Four

inspecting, repairing, and replacing facility emergency equipment; (b) operating communications or alarm systems; (c) response to fires or explosions; (d) hazardous waste management procedures; (e) spill prevention and clean up; and (f) contingency plan implementation. Such a training program shall be directed by a person trained in hazardous waste management procedures.

Also, Moritz, Inc. does not keep the following documents required by this rule: a job title for each position at the facility related to hazardous waste management; a written job description for each title explaining the involvement in hazardous waste management; and a written description of the type, amount, and date of training given to each person.

5. OAC Rule 3745-65-51 Moritz, Inc. does not have a written contingency plan. The content of the plan is described in OAC Rule 3745-65-52; the copies of the plan that are necessary are described in OAC Rule 3745-65-53; and the need for amendment of the plan is described in OAC Rule 3745-65-54.

Such a contingency plan shall be designed to minimize hazards to human health or the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water. The provisions of the contingency plan shall be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment. The plan shall incorporate the emergency procedures of OAC Rule 3745-65-56.

The contingency plan shall include, but not be limited to: (a) facility response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents; (b) written agreements with local police and fire departments and emergency contractors; (c) names, addresses, and telephone numbers, home and office, of all qualified emergency coordinators; (d) a list of all emergency equipment at the facility; (e) the location and physical description of each item on the emergency equipment list; and (f) an evacuation plan.

6. OAC Rule 3745-65-55 Moritz, Inc. does not have a designated emergency coordinator(s) thoroughly familiar with all aspects of a facility contingency plan (which must be developed), all

Mr. Jim Boyd  
January 10, 1990  
Page Five

operations and activities at the facility, the location and characteristics of all waste stored, and the location of all records within the facility.

7. OAC Rule 3745-65-73 Moritz, Inc. does not keep a written operating record. Such a written record must include, but not be limited to: (a) a description and quantity of each hazardous waste and the method and date of its treatment, storage, or disposal within the facility; (b) the location of all hazardous waste at the facility and the quantity at each location; (c) the common name, EPA hazardous waste code, and physical state of the waste; (d) records of waste analysis; (e) records of incidents that require implementation of the contingency plan; (f) records and results of inspections; and (g) all closure cost estimates.
8. OAC Rule 3745-66-12(B)(5) Moritz, Inc. does not have closure plan that includes a description of all activities necessary to ensure that closure satisfies the closure performance standards including, but not limited to, groundwater monitoring.
9. OAC Rule 3745-68-02 Moritz, Inc. does not comply with the general operating requirements for a hazardous waste landfill including, but not limited to: (a) run-on control system; (b) run-off management system; (c) collection and holding facility management; and (d) cover or wind dispersal management.
10. OAC Rule 3745-68-10 Moritz, Inc. does not have a closure plan for the land disposal unit that includes, though not limited to: geological and soil profiles, and surface and subsurface hydrology of the site.

The following violations of land disposal restriction rules for first third wastes are noted here:

11. OAC Rule 3745-59-07 and 40 CFR 268.7 Moritz, Inc. does not include the corresponding treatment standards and all applicable prohibitions in its notification to the treatment, storage, and disposal facility.

This inspection did not include a detailed review for compliance with the groundwater monitoring requirements of Ohio's hazardous waste regulations. It also did not include a review for compliance with the financial assurance requirements.

Mr. Jim Boyd  
January 10, 1990  
Page Six

It has been noted that the Northwest District Office has no record that Moritz, Inc. has acknowledged or corrected violations of Ohio's hazardous waste rules for a treatment, storage, or disposal facility. This Agency is concerned by the new and continuing violations at Moritz, Inc. Moritz, Inc. has been referred to the Ohio Attorney General's Office for enforcement of Ohio's hazardous waste laws.

Please respond, in writing, to this Notice of Violation (NOV) within 10 days. Your response must include all actions and timetables necessary to achieve compliance with Ohio's hazardous waste laws.

Failure to list specific deficiencies in this NOV does not relieve you from the responsibility of complying with all applicable regulations.

A copy of the completed inspection form is enclosed for your review. If you have any questions, please contact me immediately.

Sincerely,



Don North  
Division of Solid and  
Hazardous Waste Management

Enclosure

/dlh

cc: Laurie Stevenson, DSHWM, CO  
Cindy Lohrbach, DSHWM, NWDO  
A&C Representative, NWDO  
Jeff Mayhugh, DSHWM, CO  
Chris Korleski, AGO  
NWDO File

# Cook Environmental Engineering

Environmental Consulting

TO KB

3000 McKnight East Drive  
Suite 104  
Pittsburgh, PA 15237  
(412) 364-8170  
Fax: (412) 364-8065

June 20, 1990

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Att: Mr. Kevin M. Pierard 5HR-12  
U.S. Environmental Protection Agency  
230 South Dearborn Street  
Chicago, Illinois 60604

REF: NOTICE OF VIOLATION - MORITZ, INC.  
IN RESPONSE TO 5HR-12 6-6-90 CORRESPONDENCE

Dear Mr. Pierard:

On behalf of Moritz, Inc., as their Environmental Consulting Engineer, this letter is in response to the above referenced NOTICE OF VIOLATION, preceded by the OhioEPA facility inspection conducted on October 31, 1989.

With respect to the three (3) items in the NOTICE OF VIOLATION relative to the RCRA land disposal restrictions and in order of their appearance in such notice, the following explanation and additional information is herein provided:

1. Moritz, Inc. has determined by knowledge and experience with the xylene and toluene liquid wastes that they are hazardous by EPA IGNITABILITY and are restricted from land disposal. Moritz, Inc. has determined by knowledge and experience with the floor sweeping solid wastes that they are also hazardous by EPA IGNITABILITY and restricted from land disposal. Furthermore, beginning on this date and continuing henceforth, Moritz, Inc. will be providing the hazardous waste transporter and the hazardous waste incineration facility with a written notification and certification to be attached and made part of each manifest for each waste shipment the following statement:

"THE GENERATOR OF THE WASTE DESCRIBED IN THIS MANIFEST FOR WASTE SHIPMENT AND DISPOSAL IS HEREBY NOTIFYING THE TRANSPORTER AND DISPOSER THAT MORITZ, INC. IS MANAGING A RESTRICTED WASTE UNDER 40 CFR PART 268.7 WHICH HAS BEEN IDENTIFIED BY KNOWLEDGE OF THE WASTE TO BE HAZARDOUS BY EPA IGNITABILITY AND CAN NOT BE LAND DISPOSED. \*\*\*\*\* THIS WASTE MUST BE DISPOSED BY THERMAL INCINERATION ONLY. \*\*\*\*\*"

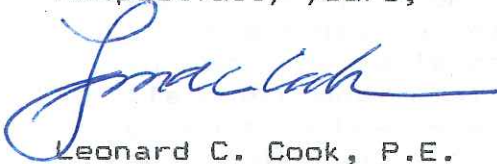
RECEIVED  
JUN 22 1990  
OFFICE OF RCRA  
WASTE MANAGEMENT DIVISION  
EPA REGION V

Mr. Kevin M. Pierard      SHR-12  
June 20, 1990  
Page 2 of 2

2. The waste analysis plan for the Moritz facility is to assure that all liquid xylene, liquid toluene, and floor sweeping wastes are defined by knowledge of the wastes as being hazardous by EPA IGNITABILITY, and properly contained in labeled containers until transported and disposed by thermal incineration. A waste analyses plan has be included in the Site Closure Plan (currently pending approval by the OhioEPA) for the contaminated soils on the property.
3. Moritz does retain on-site copy of all notices, certificates, demonstrations, waste analysis, and other documentation produced for at least five (5) years from the date that the waste was last sent to off-site disposal as required by 40 CFR 268.7 (a) (6) and (c) (1); on-site disposal of liquid xylene, liquid toluene, and floor sweepings is currently being handled by enforcement action taken by the State of Ohio Case No. 88-587-H.

We trust that this response satisfies this NOTICE OF VIOLATION and provides the agency with assurance that corrective action has been instituted by Moritz, Inc. to assure future compliance with the above referenced items. If not, please contact Mr. James Boyd, Moritz, Inc. Plant Manager, immediately at 419-589-2435.

Respectfully yours,



Leonard C. Cook, P.E.

cc: James Boyd

...  
JUN 06 1990

5HR-12

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Frank Moritz  
Moritz, Inc.  
400 Park Avenue East  
Mansfield, Ohio 44905

Re: Notice of Violation  
Moritz, Inc.  
OHD 982 218 489

Dear Mr. Moritz:

On October 31, 1989, the Ohio Environmental Protection Agency (OEPA) representing the United States Environmental Protection Agency (U.S. EPA) conducted an inspection under the Resource Conservation and Recovery Act (RCRA) at the referenced facility. The purpose of the inspection was to determine the compliance status of your facility with respect to the applicable hazardous waste management requirements of RCRA, including the land disposal restrictions.

With respect to the land disposal restrictions section of the inspection, the following violations were identified:

1. Failure to determine whether the waste exceeds treatment standards, as required by 40 CFR 268.7(a) and (c) (2);
2. Failure to maintain a waste analysis plan to include 40 CFR Part 268 requirements in accordance with 40 CFR 265.13; and
3. Failure to retain on-site a copy of all notices, certifications, demonstrations, waste analysis data, and other documentation produced for at least five (5) years from the date that the waste was last sent to on-site or off-site treatment, storage, or disposal, as required by 40 CFR 268.7(a) (6) and (c) (1).

Please submit to this office within thirty (30) days of receipt of this Notice of Violation, documentation demonstrating that these violations have been corrected and indicating what measures have been initiated to assure future compliance. Failure to correct these violations may subject your facility to further Federal enforcement action.

If you have any questions regarding this correspondence, please contact Kenneth Bardo at (312) 886-7566.

Sincerely yours,

Kevin M. Pierard, Chief  
Ohio/Minnesota Technical Enforcement Section

cc: Chuck Hull, OEPA-NWDO  
Janet Leite, OEPA-NWDO

bcc: Lisa Pierard, RPB-OH  
Francene Harris, REB

5HR-12:FHARRIS/KBARDO:6-7566:5/30/90:MORITZ.NOV

RCRA ENFORCE- MENT	REB STAFF KB 6/5	REB SECTION CHIEF JP 6/6/90	REB CHIEF
INIT. DATE			

RCRA CONCURRENCE SHEET

SUBJECT: LDR - NOV - Moritz

\*\*\*\*\*

CONCURRENCES ON DRAFT

	<u>INITIALS</u>	<u>DATE</u>
TYPIST/SECRETARY	<u>JH</u>	<u>6/1</u>
PREPARER	<u>JH</u>	<u>1/1</u>
CHIEF, OH/MN TES	<u>JP</u>	<u>6/4</u>
OTHERS	<u>KB</u>	<u>6/4</u>

\*\*\*\*\*

APPROVAL

	<u>INITIALS</u>	<u>DATE</u>
1 TYPIST/SECRETARY	<u>JH</u>	<u>6/5</u>
2 PREPARER	<u>JH</u>	<u>6/5</u>
3 CHIEF, OH/MN TES	<u>JP</u>	<u>6-6-90</u>
4 SECRETARY		
REB SECRETARY		
CHIEF, REB		
CHIEF, RPB		
OFFICE OF RCRA A.D.D.		
W.D. DIRECTOR		
OTHERS	<u>KB</u>	<u>6/5</u>

# RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: Moritz, Inc.

U.S. EPA I.D. No.: TrailerMaster (CHD982218439)

Street: 400 Park Avenue East

City: Mansfield State: Ohio Zip Code: 44905

Telephone: (419) 522-2323

Operator: \_\_\_\_\_

Street: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Telephone: \_\_\_\_\_

Owner: \_\_\_\_\_

Street: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Telephone: \_\_\_\_\_

Inspection Date: 10/31/89 Time: 10 AM - 12:00 Weather Conditions: cold & rainy

	<u>Name</u>	<u>Affiliation</u>	<u>Telephone</u>
Inspectors:	<u>Janet Bayer</u>	<u>OEPA/DSI/HWM/WWDO</u>	<u>(419) 352-3461</u>

Facility Representatives: Frank Moritz, Tom Moritz

James Boyd (419) 522-2323

	<u>RCRA Status</u>	<u>F-Solvent</u>	<u>LDR Status California List</u>	<u>First Third</u>
Generator	<u>✓</u>	<u>✓</u>	_____	_____
Transporter	_____	_____	_____	_____
Treater	_____	_____	_____	_____
Storer	_____	_____	_____	_____
Disposer	<u>✓</u>	<u>✓</u>	_____	_____

## INSPECTION SUMMARY

Moritz, Inc. manufactures trailers for hauling horses/livestock. The facility is considered a "land disposal unit" because of paint and solvent dumping in area behind plant. A closure plan has been submitted to DEPA by Leonard Cook, PE who represents the company.

The facility generates <1000 kg/mo of waste solvents, paints, and solvent soaked cleaning rags.

## RCRA LAND DISPOSAL RESTRICTION INSPECTION

## APPLICABILITY CHECKLIST

Does the facility handle the following wastes?

		Gen.	Treat	Store	Disp.	Trans.
A.	<u>F-Solvent Wastes</u>					
1.	F001	_____	_____	_____	_____	_____
2.	F002	_____	_____	_____	_____	_____
3.	F003	<u>X</u>	_____	_____	<u>X</u>	_____
4.	F004	_____	_____	_____	_____	_____
5.	F005	<u>X</u>	_____	_____	<u>X</u>	_____

Note: Use Appendix A to determine whether the facility is misclassifying any of its wastes.

B. California List Wastes

X Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains the following metals at concentrations greater than or equal to those specified

		Gen.	Treat	Store	Disp.	Trans.
Arsenic	500 mg/L	_____	_____	_____	_____	_____
Cadmium	100 mg/L	_____	_____	_____	_____	_____
Chromium VI	500 mg/L	_____	_____	_____	_____	_____
Lead	500 mg/L	_____	_____	_____	_____	_____
Mercury	20 mg/L	_____	_____	_____	_____	_____
Nickel	134 mg/L	_____	_____	_____	_____	_____
Selenium	100 mg/L	_____	_____	_____	_____	_____
Thallium	130 mg/L	_____	_____	_____	_____	_____

- ☒ Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains free cyanides at concentrations greater than or equal to 1,000 mg/L

Gen.	Treat	Store	Disp.	Trans.
_____	_____	_____	_____	_____

- ☒ Liquid hazardous waste that has a pH of less than or equal to 2.0

_____	_____	_____	_____	_____
-------	-------	-------	-------	-------

- ☒ Liquid hazardous waste that contains PCBs at concentrations greater than or equal to

50 ppm \_\_\_\_\_

500 ppm \_\_\_\_\_

Does the facility mix liquid hazardous waste that contains PCBs with other types of wastes?

\_\_\_\_\_ Yes      \_\_\_\_\_ No      \_\_\_\_\_ NA

If yes, state reasons for mixing:

\_\_\_\_\_  
\_\_\_\_\_

- ☒ Hazardous waste that contains HOCs greater than or equal to 1,000 mg/L (liquids) or 1,000 mg/kg (solids)

\_\_\_\_\_

Note (1): The prohibitions of 268.32(a)(3) and (e) do not apply if the waste is also subject to the solvent restrictions of 268 Subpart C for a specific HOC.

Note (2): The effective date of regulation for liquid wastes with HOCs greater than or equal to 1,000 mg/L and less than 10,000 mg/L was July 8, 1987; the effective date for liquid wastes containing HOCs greater than or equal to 10,000 mg/L and solid wastes containing HOCs greater than 1,000 mg/kg is November 8, 1988.

C. ~~First~~ Third Wastes

- Note: (1) The detailed description for waste codes are listed in Appendix C.  
 (2) EPA has promulgated the treatment standards for the following waste code with \*.

	Gen.	Treat	Store	Disp.	Trans.
F006*	_____	_____	_____	_____	_____
F007	_____	_____	_____	_____	_____
F008	_____	_____	_____	_____	_____
F009	_____	_____	_____	_____	_____
F019	_____	_____	_____	_____	_____
K001*	_____	_____	_____	_____	_____
K004*	_____	_____	_____	_____	_____
K008*	_____	_____	_____	_____	_____
K011	_____	_____	_____	_____	_____
K013	_____	_____	_____	_____	_____
K014	_____	_____	_____	_____	_____
K015*	_____	_____	_____	_____	_____
K016*	_____	_____	_____	_____	_____
K017	_____	_____	_____	_____	_____
K018*	_____	_____	_____	_____	_____
K019*	_____	_____	_____	_____	_____
K020*	_____	_____	_____	_____	_____
K021*	_____	_____	_____	_____	_____
K022*	_____	_____	_____	_____	_____
K024*	_____	_____	_____	_____	_____
K025*	_____	_____	_____	_____	_____
K030*	_____	_____	_____	_____	_____
K031	_____	_____	_____	_____	_____
K035	_____	_____	_____	_____	_____
K036*	_____	_____	_____	_____	_____
K037*	_____	_____	_____	_____	_____
K044*	_____	_____	_____	_____	_____
K045*	_____	_____	_____	_____	_____
K046*	_____	_____	_____	_____	_____

## APP

	Gen.	Treat	Store	Disp.	Trans.
K047°					
K048°					
K049°					
K050°					
K051°					
K052°					
K060°					
K061°					
K062°					
K069°					
K071°					
K073°					
K083°					
K084					
K085					
K086°					
K087°					
K099°					
K100°					
K101°					
K102°					
K103°					
K104°					
K106°					
P001					
P004					
P005					
P010					
P011					
P012					
P015					
P016					
P018					

APP

	Gen.	Treat	Store	Disp.	Trans.
P020					
P030					
P036					
P037					
P039					
P041					
P048					
P050					
P058					
P059					
P063					
P068					
P069					
P070					
P071					
P081					
P082					
P084					
P087					
P089					
P092					
P094					
P097					
P102					
P105					
P108					
P110					
P115					
P120					
P122					
P123					
U007					
U009					

	Gen.	Treat	Store	Disp.	Trans.
U010	_____	_____	_____	_____	_____
U012	_____	_____	_____	_____	_____
U016	_____	_____	_____	_____	_____
U018	_____	_____	_____	_____	_____
U019	_____	_____	_____	_____	_____
U022	_____	_____	_____	_____	_____
U029	_____	_____	_____	_____	_____
U031	_____	_____	_____	_____	_____
U036	_____	_____	_____	_____	_____
U037	_____	_____	_____	_____	_____
U041	_____	_____	_____	_____	_____
U043	_____	_____	_____	_____	_____
U044	_____	_____	_____	_____	_____
U046	_____	_____	_____	_____	_____
U050	_____	_____	_____	_____	_____
U051	_____	_____	_____	_____	_____
U053	_____	_____	_____	_____	_____
U061	_____	_____	_____	_____	_____
U063	_____	_____	_____	_____	_____
U064	_____	_____	_____	_____	_____
U066	_____	_____	_____	_____	_____
U067	_____	_____	_____	_____	_____
U074	_____	_____	_____	_____	_____
U077	_____	_____	_____	_____	_____
U078	_____	_____	_____	_____	_____
U086	_____	_____	_____	_____	_____
U089	_____	_____	_____	_____	_____
U103	_____	_____	_____	_____	_____
U105	_____	_____	_____	_____	_____
U108	_____	_____	_____	_____	_____
U115	_____	_____	_____	_____	_____
U122	_____	_____	_____	_____	_____
U124	_____	_____	_____	_____	_____

	APP				
	Gen.	Treat	Store	Disp.	Trans.
U129					
U130					
U133					
U134					
U137					
U151					
U154					
U155					
U157					
U158					
U159					
U171					
U177					
U180					
U185					
U188					
U192					
U200					
U209					
U210					
U211					
U219					
U220					
U221					
U223					
U226					
U227					
U228					
U237					
U238					
U248					
U249					

## RCRA LAND DISPOSAL RESTRICTION INSPECTION

## GENERATOR CHECKLIST

## GENERATOR REQUIREMENTS

A. BDAT Treatability Group - Treatment Standards Identification

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

\_\_\_\_ Yes    ☒ No    \_\_\_\_ NA

If yes, check the appropriate treatability group.

- \_\_\_\_ Wastewaters containing solvents (less than or equal to 1% TOC by weight)  
\_\_\_\_ Pharmaceutical wastewater containing spent methylene chloride  
☒ All other spent solvent wastes

- ☒ California List Wastes: Does the generator correctly determine the appropriate treatment standard of the waste?

- ☒ For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

\_\_\_\_ Yes    \_\_\_\_ No    \_\_\_\_ NA

If yes, specify the method: \_\_\_\_\_

- ☒ For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods (40 CFR 761.60 (c))?

\_\_\_\_ Yes    \_\_\_\_ No    \_\_\_\_ NA

If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

3 **First Third Wastes: Does the generator correctly determine the appropriate treatability group of the waste?**

\_\_\_\_ Yes \_\_\_\_ No X NA

If yes, check the appropriate treatability group.

\_\_\_\_ Wastewater (less than 1% TOC by weight and less than 1% filterable solids)  
 \_\_\_\_ Nonwastewaters

List the waste code and check the correct treatment standard group.

Waste Code	Wastewater	Nonwastewater
<u>F003</u>	_____	<u>Xylene</u>
<u>F005</u>	_____	<u>Toluene</u>
_____	_____	_____
_____	_____	_____

## B. Waste Analysis

### 1. F-Solvent Wastes

a. Does the generator determine whether the F-solvent waste exceeds treatment standards?

\_\_\_\_ Yes X No \_\_\_\_ NA

How was this determination made?

- Knowledge of waste

\_\_\_\_ Yes \_\_\_\_ No

If yes, is any supporting data available for review? Describe how this is adequate. \_\_\_\_\_

- TCLP

\_\_\_\_ Yes \_\_\_\_ No

If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results. \_\_\_\_\_

- b. Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

☒ Yes    ☐ No    ☐ NA

If yes, specify the waste stream:

F003 xylene  
F005 solvent

- c. Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?

☐ Yes    ☐ No    ☒ NA

- d. How does the generator test F-solvent waste when a process or waste stream changes?

N/A

☒ 2. California List Wastes

- ☒ a. Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846?

☐ Yes    ☐ No    ☐ NA

- ☒ b. If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?

☐ Yes    ☐ No    ☐ NA

What type of absorbent is used? \_\_\_\_\_

Check the types of waste to which absorbent is added.

☐ Liquid hazardous waste having a pH less than or equal to 2

☐ Liquid hazardous waste containing metals

☐ Liquid hazardous waste containing free cyanides

- ☒ c. Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on:

- Knowledge of wastes

☐ Yes    ☐ No    ☐ NA

If yes, is any supporting data available for review? Describe how this is adequate. \_\_\_\_\_

**Testing**

\_\_\_\_\_ Yes \_\_\_\_\_ No \_\_\_\_\_ NA

If yes, list test method used: \_\_\_\_\_

☒ d. Does the generator determine if concentration levels in the PFLT filtrate exceed cyanide and metals concentration levels?

\_\_\_\_\_ Yes \_\_\_\_\_ No \_\_\_\_\_ NA

- If yes, list test method used and constituent and concentration levels that exceeded prohibition levels: \_\_\_\_\_

☒ e. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

\_\_\_\_\_ Yes \_\_\_\_\_ No \_\_\_\_\_ NA

☒ 3. **First Third Wastes:**

☒ a. Does the generator correctly determine the appropriate treatment standard of the waste?

\_\_\_\_\_ Yes \_\_\_\_\_ No \_\_\_\_\_ NA

Note: The treatment standards for first third wastes are given in Appendix D.

☒ b. Does the generator determine whether the First Third waste exceeds treatment standards upon generation?

\_\_\_\_\_ Yes \_\_\_\_\_ No \_\_\_\_\_ Soft hammer

If yes, specify the waste stream: \_\_\_\_\_

How was this determination made?

- Knowledge of waste

\_\_\_\_\_ Yes \_\_\_\_\_ No

If yes, is any supporting data available for review? Describe how this is adequate. \_\_\_\_\_

## - TCLP

\_\_\_\_ Yes \_\_\_\_ No \_\_\_\_ NA

## - Total Constituent Analysis

\_\_\_\_ Yes \_\_\_\_ No \_\_\_\_ NA

Provide the date of last test, the frequency of testing, and note any problems. Attach test results.

\_\_\_\_\_  
\_\_\_\_\_

☒ Does the generator dilute the waste as a substitute for adequate treatment [268.3)?

\_\_\_\_ Yes \_\_\_\_ No \_\_\_\_ NA

☒ How does the generator test the waste when a process or waste stream changes?

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

C. Management

## 1. On-Site Management

Is restrict waste or waste that exceeds the treatment standards treated, stored, or disposed on-site?

☒ Yes \_\_\_\_ No

If yes, the TSD Checklist must be completed.

## 2. Off-Site Management

a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

\_\_\_\_ Yes ☒ No None for TSD yet

b. Does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

\_\_\_\_ Yes \_\_\_\_ No

## c. Does notification contain the following?

EPA Hazardous waste number(s)	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Applicable treatment standards	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Manifest number	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Waste analysis data, if available	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Identify off-site treatment or storage facilities: \_\_\_\_\_  
\_\_\_\_\_

## d. Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?

☐ Yes ☐ No

## e. Does the generator provide notification and certification to the disposal facility [268.7(a)(2)]?

☐ Yes ☐ No

## f. Does notification contain the following?

EPA Hazardous waste number(s)	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Applicable treatment standards	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Manifest number	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Waste analysis data, if available	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Certification that the waste meets treatment standards	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Identify off-site land disposal facilities: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

## g. Is the waste subject to a nationwide variance, case by case extension (268.5), or petition (268.6)?

☐ Yes ☐ No ☐ NA

## h. If yes, does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal [268.7(a)(3)]?

☐ Yes ☐ No

i. If yes, does the notification contain the following information?

EPA Hazardous waste number	_____ Yes	_____ No
The corresponding treatment standards and all applicable prohibitions	_____ Yes	_____ No
Manifest number	_____ Yes	_____ No
Waste analysis data, if available	_____ Yes	_____ No
Date the waste is subject to the prohibitions	_____ Yes	_____ No

j. Does the generator retain copies of all notices and certifications for a period of 5 years?

\_\_\_\_\_ Yes \_\_\_\_\_ No

D Demonstration and Certification -- "Soft Hammer" Wastes

- a. Has the generator attempted to locate and contract with treatment and recovery facilities that provide treatment that yields the greatest environmental benefit [268.8(a)(1)]?
- \_\_\_\_\_ Yes \_\_\_\_\_ No
- b. Has the generator submitted to the Regional Administration a demonstration and certification containing the following information to document its efforts to locate practically available treatment:

A list of facilities and facility officials contacted?	_____ Yes	_____ No
Addresses	_____ Yes	_____ No
Telephone Numbers	_____ Yes	_____ No
Contact dates	_____ Yes	_____ No

Attach a copy of the demonstration and certification

- c. If the generator has determined that there is no practically available treatment for its wastes, has it sent documentation to EPA demonstrating why it was not able to obtain treatment or recovery for the waste?
- \_\_\_\_\_ Yes \_\_\_\_\_ No

If yes, attach a copy of written discussion.

d. Does the generator ship his waste off-site for treatment?

\_\_\_\_\_ Yes \_\_\_\_\_ No

Describe the type of treatment and treatment facilities \_\_\_\_\_

\_\_\_\_\_

e. Did the generator send a copy of its demonstration and certification to the receiving facility with the first shipment of waste?

\_\_\_\_\_ Yes \_\_\_\_\_ No

f. Does the generator provide certification with each subsequent shipment of wastes?

\_\_\_\_\_ Yes \_\_\_\_\_ No

g. Does the generator provide the following notification to the receiving facility with each shipment of waste?

(i) EPA Hazardous waste number \_\_\_\_\_ Yes \_\_\_\_\_ No

(ii) Manifest number \_\_\_\_\_ Yes \_\_\_\_\_ No

(iii) Waste analysis data,  
if available \_\_\_\_\_ Yes \_\_\_\_\_ No

h. Does the generator retain copies of all notices, demonstrations, and certifications for a period of 5 years?

\_\_\_\_\_ Yes \_\_\_\_\_ No

**E. Treatment Using RCRA 264/265 Exempt Units or Processes**  
(i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)

Are treatment residuals generated from units or processes exempt under RCRA 264/265?

\_\_\_\_\_ Yes \_\_\_\_\_ No

If yes, list types of waste treatment units and processes:

\_\_\_\_\_

\_\_\_\_\_

## RCRA LAND DISPOSAL RESTRICTION INSPECTION

## TRANSPORTER CHECKLIST

## TRANSPORTER REQUIREMENTS

- A. Does the transporter accumulate waste for more than 10 days [268.50(A)(3)]?

\_\_\_\_\_ Yes \_\_\_\_\_ No

If yes, check the appropriate regulatory status:

\_\_\_\_\_ Interim status for storage

\_\_\_\_\_ RCRA permit for storage

If no, describe inventory controls to ensure that wastes are not stored for more than 10 days: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- B. Does the transporter mix, combine, or recontainerize wastes?

\_\_\_\_\_ Yes \_\_\_\_\_ No

- C. Is the waste treated in an exempt treatment process on-site?

\_\_\_\_\_ Yes \_\_\_\_\_ No

## RCRA LAND DISPOSAL RESTRICTION INSPECTION

## TSD CHECKLIST

## TSD REQUIREMENTS

A. General Facility Standards

1. Does the waste analysis plan cover Part 268 requirements [264.13 or 265.13]? *plan pending*

o F-solvent	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> NA
o California List	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> NA
o First Third	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> NA

2. Does the facility obtain representative chemical and physical analyses of wastes and residues?

☐ Yes ☒ No

- a. What date was the waste analysis plan last revised? \_\_\_\_\_

- b. Are analyses conducted on-site or off-site?

☐ On-site ☐ Off-site

Identify off-site lab: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

- c. Is F-solvent waste analyzed using TCLP?

☐ Yes ☐ No ☐ NA

- ☒ Is First Third waste analyzed using the analytical method that is appropriate for the objective of the specified BDAT (i.e., total constituent analysis for destruction technologies and TCLP for stabilization/fixation technologies)?

☐ Yes ☐ No ☐ NA

Note: The appropriate analytical methods (TCLP or total constituent) for first third wastes with specified treatment standards are given in Appendix D.

- e. Describe the frequency of sampling: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

3. Are the operating records, including analyses and quantities, complete [264.73/265.73]?

\_\_\_\_\_ Yes \_\_\_\_\_ No

**B. Storage (268.50)**

1. Are restricted wastes stored on-site?

\_\_\_\_\_ Yes \_\_\_\_\_ No

If no, go to C, Treatment.

2. If yes, check the appropriate method.

\_\_\_\_\_ Tanks  
\_\_\_\_\_ Containers

3. Are all containers clearly marked to identify the contents and date(s) entering storage?

\_\_\_\_\_ Yes \_\_\_\_\_ No \_\_\_\_\_ NA

4. Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage?

\_\_\_\_\_ Yes \_\_\_\_\_ No

5. Do operating records agree with container labeling?

\_\_\_\_\_ Yes \_\_\_\_\_ No \_\_\_\_\_ NA

6. Do operating records contain copies of the notice, certification, and demonstration (if applicable) from the generator for the past 5 years?

\_\_\_\_\_ Yes \_\_\_\_\_ No

7. Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect?

\_\_\_\_ Yes      \_\_\_\_ No      \_\_\_\_ NA

If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?

\_\_\_\_ Yes      \_\_\_\_ No

If yes, state how: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

8. Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

\_\_\_\_ Yes      \_\_\_\_ No      \_\_\_\_ NA

If yes, do the operating records show that the volume of waste removed from tanks annually equals or is more than the tank volume?

\_\_\_\_ Yes      \_\_\_\_ No

9. Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record?

\_\_\_\_ Yes      \_\_\_\_ No      \_\_\_\_ NA

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

C. Treatment

1. Does the facility treat restricted wastes other than in surface impoundments?

\_\_\_\_ Yes      ☒ No

If no, go to D, Treatment in Surface Impoundments.

## 2. Describe the treatment processes:

---



---



---

3. Does the facility, in accordance with an acceptable waste analysis plan, determine whether the residue or residue extract (for treatment standards expressed as concentrations in the waste extract) from all treatment processes is less than treatment standards [268.7(b)]?

\_\_\_\_\_ Yes \_\_\_\_\_ No

4. Is dilution used as a substitute for treatment?

\_\_\_\_\_ Yes \_\_\_\_\_ No

6. Are notifications, demonstration, and certification (if applicable) prepared by the generators kept in the facility's operating record?

\_\_\_\_\_ Yes \_\_\_\_\_ No

7. Does the facility ship any waste or treatment residue that meets the treatment standards to an off-site disposal facility?

\_\_\_\_\_ Yes \_\_\_\_\_ No \_\_\_\_\_ NA

If yes, does the treatment facility provide notification and certification to the disposal facility?

\_\_\_\_\_ Yes \_\_\_\_\_ No

If yes, does notification contain the following?

EPA Hazardous waste number(s)	_____ Yes	_____ No
Applicable treatment standards	_____ Yes	_____ No
Manifest number	_____ Yes	_____ No
Waste analysis data, if available	_____ Yes	_____ No
Certification that the waste meets the treatment standards	_____ Yes	_____ No

Identify off-site disposal facilities: \_\_\_\_\_

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8. Does the facility ship any "soft hammer" waste to an off-site disposal facility?

\_\_\_\_\_ Yes \_\_\_\_\_ No \_\_\_\_\_ NA

If yes, does the treatment facility send a copy of the generator's demonstration (if applicable) and certification to the disposal facility?

\_\_\_\_\_ Yes \_\_\_\_\_ No

**D. Treatment in Surface Impoundments**

1. Are restricted wastes placed in surface impoundments for treatment?

\_\_\_\_\_ Yes \_\_\_\_\_ No

If no, go to E, Land Disposal.

2. If yes, did the facility submit to the Agency the waste analysis plan and certification of compliance with minimum technology and ground-water monitoring requirements?

\_\_\_\_\_ Yes \_\_\_\_\_ No

3. If the minimum technology requirements have not been met, has a waiver been granted for that unit?

\_\_\_\_\_ Yes \_\_\_\_\_ No \_\_\_\_\_ NA

4. Are representative samples of the sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan?

\_\_\_\_\_ Yes \_\_\_\_\_ No

Attach test results.

5. Do the hazardous waste residues (sludges or liquids) exceed the treatment standards specified in 268.41, or where no treatment standards are established for a waste, the applicable prohibition levels?

\_\_\_\_\_ Yes \_\_\_\_\_ No

6. Provide the frequency of analyses conducted on treatment residues: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

7. Does the operating record adequately document the results of waste analyses performed in accordance with 268.41?

\_\_\_\_\_ Yes \_\_\_\_\_ No

8. Do the hazardous waste residues exceed the treatment standards (268.41) or do not meet the prohibition levels?

Sludge \_\_\_\_\_ Yes \_\_\_\_\_ No

Supernatant \_\_\_\_\_ Yes \_\_\_\_\_ No

- a. If yes, are sludge and supernatant removed adequately on an annual basis?

\_\_\_\_\_ Yes \_\_\_\_\_ No

- b. Are adequate precautions taken to protect liners, and do records indicate that liner integrity is inspected?

\_\_\_\_\_ Yes \_\_\_\_\_ No

- c. Are residues subsequently managed in another surface impoundment?

\_\_\_\_\_ Yes \_\_\_\_\_ No

- d. Are residues treated prior to disposal?

\_\_\_\_\_ Yes \_\_\_\_\_ No

If yes, are waste residues treated on-site or off-site?

\_\_\_\_\_ On-site \_\_\_\_\_ Off-site

Identify treatment method: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Ohio Environmental Protection Agency

DIVISION OF SOLID AND  
HAZARDOUS WASTE MANAGEMENT



Northwest District Office  
1035 Devlac Grove Drive  
Bowling Green, Ohio 43402

E. Land Disposal

1. Are restricted wastes placed in landfills, surface impoundments, waste units, salt domes/beds, mines/caves,

(419) 352-8461

☒ Yes ☐ No

Note: Do not include surface impoundments addressed in D, Treatment in Surface Impoundments.

If yes, specify which units and what wastes each unit has received: FOO3, FOO5, and waste paint

2. Are these wastes disposed of in a new, replacement, or laterally expanded landfill or impoundment that meets the minimum technology requirements (double liner and leachate collection) and groundwater monitoring?

☐ Yes ☒ No

3. Does the facility operating record have notices, certifications, and demonstration (if applicable) from generators/storer/treaters for 5 years [268.7(c); 268.7(a),(b)]?

☐ Yes ☒ No

4. Does the facility obtain waste analysis data or test the wastes (according to the waste analysis plan) to determine that the wastes comply with the applicable treatment standards [268.7(c)]?

☐ Yes ☒ No

If yes, at what frequency? \_\_\_\_\_

5. If restricted wastes that exceed the treatment standards are placed in land disposal units (excluding national capacity variances) [268.30(a)], does facility have an approved waiver based on no migration petition [268.6], an approved case-by-case capacity extension [268.5], or variance [268.44]?

☐ Yes ☒ No

6. Does the facility dispose of restricted wastes that are subject to a national capacity variance?

☐ Yes ☒ No

*Francene - missing page  
The missing page  
25 to  
Janet M. Leite  
-Ken*

7. Does the facility have notices [268.7(a)(3)] and records of disposal for disposed wastes that are subject to a national capacity variance, case-by-case extensions [268.5], or no migration petitions [268.6]?

☐ Yes ☐ No ☒ NA

8. What is the volume of the restricted wastes disposed of to date?

unknown - Preliminary sampling to take place soon  
to define closure unit

9. If the facility has a case-by-case extension, is the facility making progress as described in progress reports?

☐ Yes ☐ No ☒ NA



State of Ohio Environmental Protection Agency

Northwest District Office  
1035 Devlac Grove Dr.  
Bowling Green, Ohio 43402  
(419) 352-8461

LBAN 15

TO: Ken  
Bardo

Richard F. Celeste  
Governor

Re: Richland County  
Moritz, Inc.  
Hazardous Waste

November 16, 1989

Mr. Frank Moritz  
Moritz, Inc.  
400 Park Avenue East  
Mansfield, Ohio 44905

Dear Mr. Moritz:

An inspection was conducted at Moritz, Inc. in the presence of Tom Moritz, James Boyd, Leonard Cook, and yourself on October 31, 1989. The purpose of this inspection is to assess compliance with state and federal regulations applicable to a generator, and treatment, storage and disposal facility of hazardous waste. The following violations of state and federal law were noted at the time of the inspection:

1. OAC 3745-65-13(A)(1),(B) and 40 CFR 265.13(a)(b) -  
Waste Analysis

Failure to provide waste analysis before an owner or operator treats, stores or disposes of any hazardous waste.  
Failure to provide a written waste analysis plan.

2. OAC 3745-68-01,02,09,12,14 and 40 CFR 265.301, .302, .309, .312, .314

Failure to comply with requirements for landfilling of hazardous wastes.

3. OAC 3745-54-75 and 40 CFR 265.75 - Reporting Requirements

Failure to comply with biennial and annual reporting requirements.

This inspection did not include a review of the ground water monitoring or financial assurance requirements under RCRA. The results of the land disposal restriction portion of this inspection are being forwarded to U.S. EPA for further follow-up.

Please be advised that failure to comply with applicable hazardous waste rules may be cause for enforcement action by this Agency pursuant to Chapter 3734 of the Ohio Revised Code.

Mr. Frank Moritz  
November 16, 1989  
Page Two

Please respond, in writing, to this Notice of Violation (NOV) within ten (10) days. Your response must include all actions and timetables necessary to demonstrate compliance.

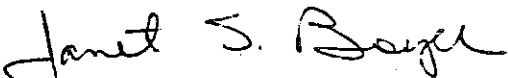
The following suggestions are recommended for improved operation:

1. Your facility (Moritz, Inc.) must apply for a U.S. EPA Hazardous Waste Identification Number. Your facility is a co-generator according to the definition in the Federal Register, October 30, 1980. Therefore you may not use the ID number assigned to Trailermaster, Ltd.
2. Name and telephone number of emergency coordinator should be posted next to the phones. Also, list the location of fire extinguishers, fire alarms, and spill control material. Also include phone number of fire department.

Failure to list specific deficiencies in this communication does not relieve you from the responsibility of complying with all applicable regulations.

A copy of the completed inspection form is enclosed for your review. If you have any questions, please advise.

Sincerely,



Janet S. Boyer  
Division of Solid and  
Hazardous Waste Management

/rab

Enclosures

cc: Teri Martin, DSHWM, CO  
Janet Leite, DSHWM, NWDO  
Chris Korleski, AGO  
Leonard Cook, PE  
NWDO File



State of Ohio Environmental Protection Agency

Northwest District Office  
1035 Devlac Grove Dr.  
Bowling Green, Ohio 43402  
(419) 352-8461

Re: Richland County  
Moritz, Inc.  
Hazardous Waste

Richard F. Celeste  
Governor

November 9, 1988

Mr. Frank Moritz  
Moritz, Inc.  
400 Park Avenue East  
Mansfield, OH 44905

Dear Mr. Moritz:

An interim status inspection was conducted at Moritz, Inc. in the presence of Tom Moritz, James Boyd, and yourself on October 27, 1988. The purpose of this inspection is to assess compliance with state and federal regulations applicable to a treatment, storage and disposal facility of hazardous waste. This inspection was conducted on the "land disposal unit" only and not on the generation of hazardous waste in the painting area. The following violations of state and federal law were noted at the time of the inspection:

1. 40 CFR 265.13(a)/OAC Rule 3745-65-13(A)(1) Waste Analysis

Failure to provide waste analysis before an owner or operator treats, stores or disposes of any hazardous waste.

1. 40 CFR 265.13(b)/OAC Rule 3745-65-13(B) Waste Analysis Plan

Failure to provide a written waste analysis plan.

3. 40 CFR 265.14(c)/OAC Rule 3745-65-14(C) Signs

Failure to provide, "Danger-Unauthorized Personnel Keep Out," signs at each entrance to the active portions of the facility and at other locations as necessary.

4. 40 CFR 265.15/OAC Rule 3745-65-15 Inspections

Failure to maintain general inspection requirements.

5. 40 CFR.16/OAC Rule 3745-65-16 Personnel Training

Failure to provide personnel training and documentation of training.

6. 40 CFR 265.51/OAC Rule 3745-65-52 Contingency Plan

Failure to provide a written contingency plan.

Mr. Frank Moritz  
November 9, 1988  
Page Two

7. 40 CFR 265.53/OAC Rule 3745-65-53 Copies of Contingency Plan

Failure to maintain a copy of the contingency plan at the facility and all necessary authorities have copies of the plan.

8. 40 CFR 265.56/OAC Rule 3745-65-56 Implementation

Failure of the emergency coordinator to implement all or part of the Contingency Plan and take all of the actions and made all of the notifications deemed necessary under a Contingency Plan when an emergency situation occurs.

9. 40 CFR 265.73/OAC Rule 3745-65-73 Operating Record

Failure to maintain a written operating record.

10. 40 CFR 265.75/OAC Rule 3745-54-75 Reporting Requirements

Failure to comply with biennial and annual reporting requirements.

11. 40 CFR 265.111, .112, .113, .114, .115, .116, .117, .119, .120/OAC Rule 3745-66-10, 11, 12, 13, 14, 15, 17, 18, 19, 20 Closure Plan

Failure to comply with all applicable closure and post-closure requirements including providing a written closure plan.

12. 40 CFR 265.301, .302, .309, .312, .314/OAC Rule 3745-68-01, 02, 09, 12, 14, Landfill

Failure to comply with requirements for landfilling of hazardous waste.

Please be advised that failure to comply with applicable hazardous waste rules may be cause for enforcement action by this Action pursuant to Chapter 3734 of the Ohio Revised Code.

Please respond, in writing, to this Notice of Violation (NOV) within ten (10) days. Your response must include all actions and timetables necessary to achieve compliance. Your facility should also comply with U.S. EPA regulations concerning RCRA Land Disposal Restrictions. At this time, the findings of these aspects of the inspection and any appropriate enforcement actions will be considered by the U.S. EPA.

Your facility (Moritz, Inc.) should apply for a U.S. EPA Hazardous Waste Identification Number as a disposal facility. Also, the caulking sealant appears to be a hazardous waste because of a flashpoint less than 140°F (D001).

Failure to list specific deficiencies in this communication does not relieve you from the responsibility of complying with all applicable regulations.

Mr. Frank Moritz  
November 9, 1988  
Page Three

A copy of the completed inspection form is enclosed for your review. If you have any questions, please advise.

Sincerely,



Rod Miller  
Div. of Solid & Hazardous Waste Mgmt.

/ca

Enclosure

cc: Dave Sholtis, DSHWM, CO  
Janet Leite, DSHWM, NWDO  
Phil Haffenden, AGO  
NWDO File

October 27 1988 7:30 AM - 10:20 AM  
Date and Time of Inspection

RCRA INTERIM STATUS INSPECTION FORM

GENERAL INFORMATION

Facility: Mortgage Inc. Address: 400 Park Avenue East City: Mansfield  
State: Ohio Zip Code: 44905 County: Richmond Telephone: (419) 522-2323

IMFAB #

U.S. EPA I.D. # OII

INSPECTION PARTICIPANT(S)

(Title)

(Telephone)

(Name)

President

(419) 522-2323

1. Frank Mority

2. Tom Mority

3. James Boyd

(419) 522-2323

(419) 522-2323

INSPECTOR(S)

OEA-DSHUM - NWD Env. Eng. II

(419) 352-8461

1. Red Miller

2. \_\_\_\_\_

3. \_\_\_\_\_

INSTALLATION ACTIVITY

If the site is a TSDF, check the boxes indicating which areas were reviewed.

Mark One

☐ Generator only (G)

☐ Transporter (T)

☐ TSDF only

☐ G-T

☒ G-TSDF

☐ T-TSDF

☐ G-T-TSDF

☒ General Facility Standards, Preparedness and Prevention, Contingency and Emergency Manifests/Records/Reporting, Closure

☐ Containers S01

☐ Tanks S02/T01

☐ Surface Impoundments S04/T02

☐ Incineration/Thermal Treatment

☐ Waste Piles S03

☐ Land Treatment D01

☒ Landfills D00

☐ Chemical/Physical/Biological T04

☐ Groundwater Monitoring

☐ Post-Closure

RCRA INTERIM STATUS INSPECTION FORM

<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
—	X	—	—
—	—	X	—
—	X	—	—
X	—	—	2 1/2 week

1. Has the facility submitted a Part A to Ohio?
2. If "yes", is it complete and accurate?
3. Has the facility submitted a Part B?
4. Has advance notice of the inspection given? If so, how far in advance?

IF THE SITE HAS RECEIVED A PART B PERMIT, USE THE RCRA STATUS INSPECTION FORM.

REMARKS. GENERAL INFORMATION

Include a brief description of site activity and waste handling.

The basic operations at this facility consist of the manufacture of trailers. The facility is considered a "land disposal unit" because of a paint and solvent dumping area behind the plant. This includes toluene, xylene and low flash point materials.

N waste has been generated because of cleanup of 1 mile W. of waste. This is painting subletting people which has been sent off site.

RCRA INTERIM STATUS INSPECTION FORM

40 CFR 262 (OAC 3745-52) GENERATOR REQUIREMENTS

	Yes	No	N/A	Remark
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Section 261 and in compliance with the requirements of Sections 262.11. [3745-52-11(D)]	—	—	—	—
2. Does this facility generate any hazardous wastes that are excluded from regulation under Section 261.4 [3745-51-04] (statutory exclusions) or Section 261.6 [3745-51-06(A)(1)] (recycle/reuse)?	—	—	—	—
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Section 265.1(c)(9)) [3745-65-01] or via operation of an elementary neutralization unit and/or wastewater treatment unit (Section 265.1(c)(10) [3745-65-01]	—	—	—	—
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Section 262.21(a) and (b) [3745-52-21] and the minimum number of copies required by Section 262.22 [3745-52-22].	—	—	—	—
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Section 262.20 [3745-52-20(B)(C)(D)].	—	—	—	—
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Section 262.23 [3745-52-23(A)(1 and 2)].	—	—	—	—
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Section 262.42(a)(b) [3745-52-42].	—	—	—	—
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Section 262.40 [3745-52-40]. (262.40(a)) [3745-52-40(a)]	—	—	—	—

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
5. The generator meets the following hazardous waste pre-transport requirements:				
a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Section 262.30, 262.31 and 262.32(a)) [3745-52-30, 3745-52-31, 3745-52-32]	—	—	—	—
b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 liters) or less is affixed with a completed hazardous waste label as required by Section 262.32(b) [3745-52-32].	—	—	—	—
c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Section 262.33 [3745-52-33].	—	—	—	—
6. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Section 262.50 [3745-52-50]	—	—	—	—
7. If the generator elects to store hazardous waste on-site in containers or tanks for 90 days or less without a RCRA storage permit as provided under Section 262.34 [3745-52-34], the following requirements with respect to such storage are met:				
a) The containers are clearly marked with the words "Hazardous Waste".	—	—	—	—
b) The date that accumulation began is clearly marked on each container.	—	—	—	—
8. The generator has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) [3745-65-16(A)(B)(C)] including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course. (Section 262.34) [3745-52-34(A)(4)]	—	—	—	—
9. The generator keeps all of the records required by Section 265.16(d)(e) [3745-65-16(D)(E)] including written job titles, job descriptions and documented employee training records (Section 262.34) [3745-52-34(A)(4)].	—	—	—	—

Revised 12/84

RCRA INTERIM STATUS INSPECTION FORM

NOTE:

SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265 [3745-65], SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND CERTAIN PORTIONS OF THE "CONTAINERS" AND "TANKS" RULES BE MET. COMPLETE THE APPROPRIATE SECTIONS OF THE INSPECTION FORM.

REMARKS. GENERATOR REQUIREMENTS

Revised 12/84

RCRA INTERIM STATUS INSPECTION FORM

40 CFR 265 (OAC 3745-65-et seq.) GENERAL INTERIM STATUS REQUIREMENTS AND TSD REQUIREMENTS

SUBPARTS INCLUDED

B: General Facility Standards  
C: Preparedness and Prevention  
D: Contingency and Emergency  
E: Manifest/Record/Reporting  
G: Closure

H: Financial Requirements  
I: Management of Containers  
J: Management of Tanks  
K: Surface Impoundments  
L: Waste Piles

M: Land Treatment  
N: Landfills  
O: Incinerators  
P: Thermal Treatment  
Q: Chemical/Physical/Biological Treatment

Subpart B: General Facility Standards

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The operator has a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by Section 265.13(a) [3745-65-13(A)(1)]	—	✓	—	—
2. The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste. (Section 265.13(b)) [3745-65-13(B)]	—	✓	—	—
3. a) Would physical contact with the waste structures or equipment injure unknowing/unauthorized persons or livestock entering the facility? (265.14(a)(1)) [3745-65-14(A)(1)]	✓	—	—	—
b) Would disturbance of the waste cause a violation of the hazardous waste regulations? (265.14(a)(2)) [3745-65-14(A)(2)]	✓	—	—	—

IF BOTH 3a AND 3b ARE "NO", MARK QUESTIONS 4 AND 5 "NOT APPLICABLE".

# RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

4. The facility has -

- a) A 24-hour surveillance system, or
- b) An artificial or natural barrier and a means to control entry at all times (265.14(b)(2)). [3745-65-14(B)(2)(a and b)]

✓  
✓  
Appears that the facility has fencing around it.

5. The facility has a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary. (265-14(c)) [3745-65-14(C)]

✓

6. a) The operator has developed and followed a comprehensive, written inspection plan and documented the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. (265.15) [3745-65-15]

✓

b) Areas subject to spills (i.e., loading and unloading areas, container storage areas, etc.) are inspected daily when in use and according to other applicable regulations when not actively in use. (265.15(b)(4)) [3745-65-15(B)(4)]

✓

7. The facility has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course. [3745-65-16(A)(B)(C)]

✓

8. The facility keeps all records required by Section 265.16(d)(e) including written job titles, job descriptions and documented employee training records. [3745-65-16(D)(E)]

✓

At this time there is no one working in the contaminated area. They don't have a personnel training program but at times may conduct safety meetings that may or may not be related to hazardous waste.

Revised 12/84

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

9. If required due to the actual hazards associated with Ignitable, Reactive or Incompatible waste materials, the facility meets the following requirements: (Section 265.17) [3745-65-17]

a) Protection from sources of ignition. ✓ Fenced — —

b) Physical separation of incompatible waste materials. — — ✓

c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled. One outside on door — —

d) Any comingling of waste materials is done in a controlled, safe manner as prescribed by Section 265.17(b). [3745-65-17(B)] — — ✓

Subpart C: Preparedness and Prevention

1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31) [3745-65-31] ✓ — —

2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32) [3745-65-32(A)(B)(C)(D)]

a) Internal alarm system. ✓ PA System — —

b) Access to telephone, radio or other device for summoning emergency assistance. ✓ — —

c) Portable fire control equipment. ✓ — —

d) Water of adequate volume and pressure via hoses sprinkler, foamers or sprayers. ✓ Hydraulic in front of building — —

3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33) [3745-65-33] ✓ Monthly tested and tagged.

4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled. (265.34) [3745-65-34] ✓ Newly installed.

*No physical handling at this time.*

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RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained. (265.35) [3745-65-35]	—	—	✓	—
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout. (265.37(a)) [3745-65-37(A)]	—	✓	—	—
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented. (265.37(b)) [3745-65-37(B)]	—	—	✓	—
<p align="center"><u>Subpart D: Contingency and Emergency</u></p>				
1. <i>Contingency factors have been discussed but no plan</i> The facility has a written Contingency Plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes (265.51) [3745-65-52(A)(B)(C)(D)(E)] and contains the following components:	—	✓	—	—
a) Actions to be taken by personnel in the event of an emergency incident.	—	✓	—	—
b) Arrangements or agreements with local or state emergency authorities.	—	✓	—	—
c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.	—	✓	—	—
d) A list of all emergency equipment including location, physical description and outline of capabilities.	—	✓	—	—
e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel. (265.51(f)) [3745-65-52(F)]	—	✓	—	—
2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan. (265.53) [3745-65-53(A)(B)]	—	✓	—	—

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RCRA INTERIM STATUS INSPECTION FORM

Yes    No    N/A    Remark #

3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan. (265.54) [3745-65-54] ✓

4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan. (265.56) [3745-65-55] *Sigsall three participants are but not plan.*

5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56(a-j). [3745-65-56(A-J)] ✓

Subpart E: Manifests/Records/Reporting

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

1. The operator maintains a written operating record at his facility as required by Section 265.73 [3745-65-73(A)] which contains the following information:

- |  |   |  |  |
|--|---|--|--|
| a) Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment, storage or disposal. (265.73(b)(1)) [3745-65-73(B)(1)]     | ✓ |  |  |
| b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).   | ✓ |  |  |
| c) The estimated (or actual) weight, volume or density of the waste material(s).   | ✓ |  |  |
| d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).   | ✓ |  |  |
| e) The present physical location of each hazardous waste within the facility.  | ✓ |  |  |
| f) <u>FOR DISPOSAL FACILITIES</u> , the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s). (265.73(b)(2)) [3745-65-73(B)(2)] | ✓ |  |  |

Revised 12/84

# RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark #
g) Records of any waste analyses and trial tests required to be performed.	—	✓	—	—
h) Records of the inspections required under Section 265.15 [3745.65-14] (General Inspection Requirements - Subpart B).	—	✓	—	—
i) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Section 265.73(b)(6). [3745-65-73(B)(6)]	—	✓	—	—
j) Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart G.	—	✓	—	—
2. The operators has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Section 265.75. [3745-65-75]	—	✓	—	—
<b>NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO <u>ONLY</u> OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.</b>				
3. Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years. (265.71) [3745-65-71(A)]	—	—	✓	—
a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met. (265.71(b)) [3745-65-71(B)]	—	—	✓	—
b) Any significant discrepancies in the manifest, as defined in Section 265.72(a) [3745-65-72(A)] are noted in writing on the manifest document. (265.71(a)(2)) [3745-65-71(A)(2)]	—	—	✓	—
4. Any manifest discrepancies have been reconciled within 15 days as required by Section 265.72(b) or the operator has submitted the required information to the Regional Administrator/Director. [3745-65-72(B)]	—	—	✓	—
5. If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage, or disposal an unmanifested waste report containing all the information required by Section 265.76 has been submitted to the Regional Administrator/Director within 15 days. [3745-65-76(A)]	—	—	✓	—

RCRA INTERIM STATUS INSPECTION FORM

Yes   No   N/A   Remark #

Subpart G: Closure and Post-Closure

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES.

- |  |                                     |   |   |
|--|-------------------------------------|---|---|
| 1. A written Closure Plan is on file at the facility and contains the following elements: (Section 265.112) [3745-66-12]   | <input checked="" type="checkbox"/> | — | — |
| a) A description of how and when the facility will be closed.<br>(265.112(a)(1)) [3745-66-12(A)(1)]  | <input checked="" type="checkbox"/> | — | — |
| b) A description of how any of the applicable closure requirements in other Subparts of Section 265 [3745-66] (Tanks, Surface Impoundments, Landfill, etc.) will be carried out. | <input checked="" type="checkbox"/> | — | — |
| c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility. (NOTE: Maximum inventory should agree with the permit.)                    | <input checked="" type="checkbox"/> | — | — |
| d) A description of steps taken to decontaminate facility equipment.   | <input checked="" type="checkbox"/> | — | — |
| e) The year closure is expected to begin and a schedule for the various phases of closure.   | <input checked="" type="checkbox"/> | — | — |
| 2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates. (265.112(4)(B)) [3745-66-12(B)]                   | <input checked="" type="checkbox"/> | — | — |
| 3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process. (265.112(4)(C)) [3745-66-12(C)]                   | <input checked="" type="checkbox"/> | — | — |

*A closure plan is currently in the process of being developed.*

RCRA INTERIM STATUS INSPECTION FORM

Yes   No   N/A   Remark #

Subpart N: Landfills

1. General Operating Requirements. Does the facility provide the following:

NOTE: 1a, 1b AND 1c ARE EFFECTIVE ON NOVEMBER 19, 1981.

- a) Diversion of run-on away from active portions of the fill? (265.302(a)) [3745-68-02(A)] ✓ —
- b) Collection of run-off from active portions of the fill? (265.302(b)) [3745-68-02(B)] ✓ —
- c) Is collected run-off treated? [3745-68-02(B)] ✓ —
- d) Control of wind dispersal of hazardous waste? (265.302(d)) [3745-68-02(D)] ✓ —

2. Surveying and Recordkeeping. Does the operating record include: [3745-68-09]

- a) a map showing the exact location and dimensions of each cell? (269.309(a)) [3745-68-09(A)] ✓ —
- b) The contents of each cell and the location of each hazardous waste type within each cell? (269.309(b)) [3745-68-09(B)] ✓ —

3. Closure and Post-Closure

- a) Is the closure Plan available for inspection? ✓ —
- b) Has this plan been submitted to the Regional Administrator? ✓ —
- c) Has Closure begun? ✓ —
- d) Is Closure cost estimate available by? ✓ —

# RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark #
4. Special requirements for ignitable or reactive waste. (265.312(a)(B))				
a) Are ignitable or reactive waste treated so the resulting mixture is no longer ignitable or reactive?		✓		
NOTE: IF WASTE IS RENDERED NON-REACTIVE OR NON-IGNITABLE, SEE TREATMENT REQUIREMENTS. IF NOT, THE PROVISIONS OF 40 CFR 265.17(b) APPLY. [3745-65-17]				
5. Special requirements for Incompatible Wastes.				
a) Does the owner or operator dispose of incompatible wastes in separate cells? If not, the provisions of 40 CFR 265.17(b) apply. [3745-65-17]			✓	
6. Special requirements for Containers:				
Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the landfill? (265.315) [3745-57-85]			✓	
7. Special requirements for Liquid Waste.				
Bulk or non-containerized liquid waste or waste containing free liquids is placed in a landfill having a liner and leachate collection and removal system meeting 264.301(a) requirements or is treated so that free liquids are no longer present. (265.314(a)) [3745-68-14(A)]		✓		
8. A written Post-Closure Plan is on file at the facility.		✓		
9. The Post-Closure Plan has been amended within 60 days in response to any changes in facility design or operation. (265.118(b))		✓		
10. The Post-Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning Closure. (265.118(c))		✓		
11. The property owner has attached a notation to the property deed or other instrument which will notify any potential purchaser that the property has been used to manage hazardous waste and future use of the property is restricted under Section 265.117(c) [3745-66-17(C)] as required in Section 265.120 [3745-66-10].		✓		

# RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: Moritz, Inc

U.S. EPA I.D. No.: \_\_\_\_\_

Street: 400 Park Avenue East

City: Mansfield State: Ohio Zip Code: 44905

Telephone: (419) 522-2323

Operator: \_\_\_\_\_

Street: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Telephone: \_\_\_\_\_

Owner: \_\_\_\_\_

Street: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Telephone: \_\_\_\_\_

Inspection Date: 10/27/88 Time: 7:30 AM - 10:20 AM Weather Conditions: Clear, Cold

	<u>Name</u>	<u>Affiliation</u>	<u>Telephone</u>
Inspectors:	<u>Red Miller</u>	<u>OEPA - DSHWM - NWBO Env. Eng II</u>	<u>(419) 352-8461</u>

Facility Representatives: Frank Moritz (419) 522-2323

Tom Moritz (419) 522-2323

James Boyd (419) 522-2323

	<u>RCRA Status</u>	<u>F-Solvent</u>	<u>LDR Status</u> <u>California List</u>
Generator	_____	_____	_____
Transporter	_____	_____	_____
Treater	_____	_____	_____
Storer	_____	_____	_____
Disposer	<u>✓</u>	<u>✓</u>	_____

## INSPECTION SUMMARY

The basic operations at this facility consist of the manufacture of trailers. The facility is considered a "land disposal unit" because of a paint and solvent dumping area behind the plant. This includes toluene, xylene, and low Flash Point materials.

**RCRA LAND DISPOSAL RESTRICTION INSPECTION  
APPLICABILITY CHECKLIST**

Does the facility handle the following wastes?

	Gen.	Treat	Store	Disp.	Trans.
<b>A. <u>F-Solvent Wastes</u></b>					
1. F001	_____	_____	_____	_____	_____
2. F002	_____	_____	_____	_____	_____
3. F003	_____	_____	_____	✓	_____
4. F004	_____	_____	_____	_____	_____
5. F005	_____	_____	_____	✓	_____

Note: Use Appendix A to determine whether the facility is misclassifying any of its wastes.

**B. California List Wastes**

- 1.** Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains the following metals at concentrations greater than or equal to those specified

		Gen.	Treat	Store	Disp.	Trans.
Arsenic	500 mg/L	_____	_____	_____	_____	_____
Cadmium	100 mg/L	_____	_____	_____	_____	_____
Chromium VI	500 mg/L	_____	_____	_____	_____	_____
Lead	500 mg/L	_____	_____	_____	_____	_____
Mercury	20 mg/L	_____	_____	_____	_____	_____
Nickel	134 mg/L	_____	_____	_____	_____	_____
Selenium	100 mg/L	_____	_____	_____	_____	_____
Thallium	130 mg/L	_____	_____	_____	_____	_____

- ☒ 2. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains free cyanides at concentrations greater than or equal to 1,000 mg/L

Gen.	Treat	Store	Disp.	Trans.
_____	_____	_____	_____	_____

- ☒ 3. Liquid hazardous waste that has a pH of less than or equal to 2.0

_____	_____	_____	_____	_____
-------	-------	-------	-------	-------

- ☒ 4. Liquid hazardous waste that contains PCBs at concentrations greater than or equal to

50 ppm \_\_\_\_\_

500 ppm \_\_\_\_\_

Does the facility mix liquid hazardous waste that contains PCBs with other types of wastes?

\_\_\_\_\_ Yes      \_\_\_\_\_ No      \_\_\_\_\_ NA

If yes, state reasons for mixing:

\_\_\_\_\_  
\_\_\_\_\_

- ☒ 5. Liquid hazardous waste that is primarily water and that contains HOCs greater than or equal to 1,000 mg/L (dilute HOC wastewater) and less than 10,000 mg/L

\_\_\_\_\_

Note: The prohibitions of 268.32(a)(3) and (e) do not apply if the HOC waste is also subject to the solvent restrictions of 268 Subpart C or a specific HOC.

## RCRA LAND DISPOSAL RESTRICTION INSPECTION

## GENERATOR CHECKLIST

## GENERATOR REQUIREMENTS

A. BDAT Treatability Group - Treatment Standards Identification

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

\_\_\_\_\_ Yes      ☒ No      \_\_\_\_\_ NA

If yes, check the appropriate treatability group.

- \_\_\_\_\_ Wastewaters containing solvents (less than or equal to 1% TOC by weight)  
\_\_\_\_\_ Pharmaceutical wastewater containing spent methylene chloride  
☒ All other spent solvent wastes

- ☒ California List Wastes: Does the generator correctly determine the appropriate treatment standard of the waste?

- ☒ a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less than 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

\_\_\_\_\_ Yes      \_\_\_\_\_ No      \_\_\_\_\_ NA

If yes, specify the method: \_\_\_\_\_

- ☒ b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods (40 CFR 761.60 (e))?

\_\_\_\_\_ Yes      \_\_\_\_\_ No      \_\_\_\_\_ NA

If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**B. Waste Analysis****1. F-Solvent Wastes**

- a. Does the generator determine whether the F-solvent waste exceeds treatment standards?

\_\_\_\_ Yes    ☒ No    \_\_\_\_ NA

How was this determination made?

- Knowledge of waste

\_\_\_\_ Yes    \_\_\_\_ No

If yes, note how this is adequate: \_\_\_\_\_

- TCLP

\_\_\_\_ Yes    \_\_\_\_ No

If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results.

- b. Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

☒ Yes    \_\_\_\_ No    \_\_\_\_ NA

If yes, specify the waste stream: \_\_\_\_\_

*FOU? Xylene  
FACS Toluene*

- c. Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?

\_\_\_\_ Yes    \_\_\_\_ No    ☒ NA

- d. How does the generator test F-solvent waste when a process or waste stream changes?

*No testing*

**2. California List Wastes**

- a. Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846?

\_\_\_\_ Yes    \_\_\_\_ No    \_\_\_\_ NA

- ☒ b. If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?

\_\_\_\_\_ Yes      \_\_\_\_\_ No      \_\_\_\_\_ NA

What type of absorbent is used? \_\_\_\_\_  
Check the types of waste to which absorbent is added.

- \_\_\_\_\_ Liquid hazardous waste having a pH less than or equal to 2
- \_\_\_\_\_ Liquid hazardous waste containing HOCs in concentrations greater than or equal to 1,000 mg/L, but less than 10,000 mg/L
- \_\_\_\_\_ Liquid hazardous waste containing metals
- \_\_\_\_\_ Liquid hazardous waste containing free cyanides

- ☒ c. Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on:

- Knowledge of wastes

\_\_\_\_\_ Yes      \_\_\_\_\_ No      \_\_\_\_\_ NA

If yes, note how this is adequate: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- Testing

\_\_\_\_\_ Yes      \_\_\_\_\_ No      \_\_\_\_\_ NA

If yes, list test method used: \_\_\_\_\_

- ☒ d. Does the generator determine if concentration levels in PFLT extract exceed cyanide and metals concentration levels?

\_\_\_\_\_ Yes      \_\_\_\_\_ No      \_\_\_\_\_ NA

- If yes, list test method used and constituent and concentration levels that exceeded prohibition levels: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- ☒ e. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

\_\_\_\_\_ Yes      \_\_\_\_\_ No      \_\_\_\_\_ NA

**C. Management****1. On-Site Management**

Is waste that exceeds the treatment standards treated, stored, or disposed on-site?

☒ Yes ☐ No

If yes, the TSD Checklist must be completed.

**2. Off-Site Management** *None for TSD sent off-site yet.*

- a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

☐ Yes ☐ No

If yes, does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

☐ Yes ☐ No

If yes, does notification contain the following?

EPA Hazardous waste number(s) ☐ Yes ☐ No

Applicable treatment standards ☐ Yes ☐ No

Manifest number ☐ Yes ☐ No

Waste analysis data, if available ☐ Yes ☐ No

Identify off-site treatment or storage facilities: \_\_\_\_\_

- b. Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?

☐ Yes ☐ No

If yes, does the generator provide notification and certification to the disposal facility [268.7(a)(2)]?

☐ Yes ☐ No

If yes, does notification contain the following?

EPA Hazardous waste number(s)	_____ Yes	_____ No
Applicable treatment standards	_____ Yes	_____ No
Manifest number	_____ Yes	_____ No
Waste analysis data, if available	_____ Yes	_____ No
Certification that the waste meets treatment standards	_____ Yes	_____ No

Identify off-site land disposal facilities: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

- c. If the waste is subject to a nationwide variance (e.g., solvent-water mixtures less than 1%), extension (268.5), or petition (268.6), does the generator provide notification to the off-site disposal facility that the waste is exempt from land disposal restrictions [268.7(a)(3)]?

\_\_\_\_\_ Yes      \_\_\_\_\_ No      \_\_\_\_\_ NA

**D. Treatment Using RCRA 264/265 Exempt Units or Processes**  
 (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)

Are treatment residuals generated from units or processes exempt under RCRA 264/265?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

If yes, list types of waste treatment units and processes:

\_\_\_\_\_  
 \_\_\_\_\_

## RCRA LAND DISPOSAL RESTRICTION INSPECTION

## TRANSPORTER CHECKLIST

## TRANSPORTER REQUIREMENTS

- A. Does the transporter accumulate waste for more than 10 days [268.50(A)(3)]?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

If yes, check the appropriate regulatory status:

\_\_\_\_\_ Interim status for storage

\_\_\_\_\_ RCRA permit for storage

If no, describe inventory controls to ensure that wastes are not stored for more than 10 days: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- B. Does the transporter mix, combine, or recontainerize wastes?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

- C. Is the waste treated in an exempt treatment process on-site?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

## RCRA LAND DISPOSAL RESTRICTION INSPECTION

## TSD CHECKLIST

## TSD REQUIREMENTS

A. General Facility Standards

1. Does the waste analysis plan cover Part 268 requirements [264.13 or 265.13]? *No waste analysis plan.*
- o F-solvent ☐ Yes ☒ No ☐ NA
- o California List ☐ Yes ☐ No ☒ NA
2. Does the facility obtain representative chemical and physical analyses of wastes and residues?
- ☐ Yes ☒ No
- a. What date was the waste analysis plan last revised? \_\_\_\_\_
- b. Are analyses conducted on-site or off-site?
- ☐ On-site ☐ Off-site
- Identify off-site lab: \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_
- c. Is F-solvent waste analyzed using TCLP?
- ☐ Yes ☐ No ☐ NA
- d. Describe the frequency of sampling: \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_
- e. Describe procedures used to identify manifest discrepancies: \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_
3. Are the operating records, including analyses and quantities, complete [264.73/265.73]?
- ☐ Yes ☒ No

**B. Storage (268.50)**

1. Are restricted wastes stored on-site?

\_\_\_\_\_ Yes \_\_\_\_\_ No

If no, go to C, Treatment in Surface Impoundments.

2. If yes, check the appropriate method.

\_\_\_\_\_ Tanks  
\_\_\_\_\_ Containers

3. Are all containers clearly marked to identify the contents and date(s) entering storage?

\_\_\_\_\_ Yes \_\_\_\_\_ No \_\_\_\_\_ NA

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

4. Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage?

\_\_\_\_\_ Yes \_\_\_\_\_ No

5. Do operating records agree with container labeling?

\_\_\_\_\_ Yes \_\_\_\_\_ No \_\_\_\_\_ NA

6. Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect?

\_\_\_\_\_ Yes \_\_\_\_\_ No \_\_\_\_\_ NA

If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?

\_\_\_\_\_ Yes \_\_\_\_\_ No

If yes, state how: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

7. Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

\_\_\_\_\_ Yes      \_\_\_\_\_ No      \_\_\_\_\_ NA

If yes, do the operating records show that the volume of waste removed from tanks annually equals or is more than the tank volume?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

8. Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record?

\_\_\_\_\_ Yes      \_\_\_\_\_ No      \_\_\_\_\_ NA

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C. Treatment

1. Does the facility treat restricted wastes other than in surface impoundments?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

If no, go to D, Treatment in Surface Impoundments.

2. Describe the treatment processes:

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3. Does the facility, in accordance with an acceptable waste analysis plan, determine whether the residue from all treatment processes is less than treatment standards [268.7(b)]?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

4. Describe frequency of testing treatment residuals:

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5. Is dilution used as a substitute for treatment?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

6. Are notifications prepared by the generators kept in the facility's operating record?

\_\_\_\_\_ Yes \_\_\_\_\_ No

7. Does the facility ship any waste or treatment residue that meets the treatment standards to an off-site disposal facility?

\_\_\_\_\_ Yes \_\_\_\_\_ No \_\_\_\_\_ NA

If yes, does the treatment facility provide notification and certification to the disposal facility?

\_\_\_\_\_ Yes \_\_\_\_\_ No

If yes, does notification contain the following?

EPA Hazardous waste number(s) \_\_\_\_\_ Yes \_\_\_\_\_ No

Applicable treatment standards \_\_\_\_\_ Yes \_\_\_\_\_ No

Manifest number \_\_\_\_\_ Yes \_\_\_\_\_ No

Waste analysis data, if available \_\_\_\_\_ Yes \_\_\_\_\_ No

Certification that the waste meets the treatment standards \_\_\_\_\_ Yes \_\_\_\_\_ No

Identify off-site disposal facilities: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

**D. Treatment in Surface Impoundments**

1. Are restricted wastes placed in surface impoundments for treatment?

\_\_\_\_\_ Yes \_\_\_\_\_ No

If no, go to E, Land Disposal.

2. If yes, did the facility submit to the Agency the waste analysis plan and certification of compliance with minimum technology and ground-water monitoring requirements?

\_\_\_\_\_ Yes \_\_\_\_\_ No

3. If the minimum technology requirements have not been met, has a waiver been granted for that unit?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

4. Are representative samples of the sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

Attach test results.

5. Do the hazardous waste residues (sludges or liquids) exceed the treatment standards specified in 268.41?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

6. Provide the frequency of analyses conducted on treatment residues: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

7. Does the operating record adequately document the results of waste analyses performed in accordance with 268.41?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

8. Are the hazardous waste residues that exceed the treatment standards (268.41) removed adequately and on an annual basis?

Sludge      \_\_\_\_\_ Yes      \_\_\_\_\_ No

Supernatant      \_\_\_\_\_ Yes      \_\_\_\_\_ No

- a. If no, and supernatant is determined to exceed treatment concentrations, is annual volume of liquid flowing through the impoundment greater than the impoundment volume?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

- b. Are adequate precautions taken to protect liners, and do records indicate that liner integrity is inspected?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

- c. Are residues subsequently managed in another surface impoundment?

\_\_\_\_\_ Yes \_\_\_\_\_ No

- d. Are residues treated prior to disposal?

\_\_\_\_\_ Yes \_\_\_\_\_ No

If yes, are waste residues treated on-site or off-site?

\_\_\_\_\_ On-site \_\_\_\_\_ Off-site

Identify treatment method: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

#### E. Land Disposal

1. Are restricted wastes placed in land disposal units such as landfills, surface impoundments waste piles, wells, land treatment units, salt domes/beds, mines/caves, or concrete vault or bunker?

☒ Yes \_\_\_\_\_ No

Note: Do not include surface impoundments addressed in D, Treatment in Surface Impoundments.

If yes, specify which units and what wastes each unit has received: \_\_\_\_\_  
 \_\_\_\_\_

2. Does the facility operating record have notices and certifications from generators/storer/treaters [268.7(c); 268.7(a),(b)]?

\_\_\_\_\_ Yes ☒ No

3. Does the facility obtain waste analysis data or test the wastes (according to the waste analysis plan) to determine that the wastes comply with the applicable treatment standards [268.7(c)]?

\_\_\_\_\_ Yes ☒ No

If yes, at what frequency? \_\_\_\_\_  
 \_\_\_\_\_

4. If restricted wastes that exceed the treatment standards are placed in land disposal units (excluding national capacity variances) [268.30(a)], does facility have an approved waiver based on no migration petition [268.6], an approved case-by-case capacity extension [268.5], or variance [268.44]?

\_\_\_\_ Yes      ☒ No

5. Does the facility dispose of restricted wastes that are subject to a national capacity variance?

\_\_\_\_ Yes      ☒ No

If yes, are these wastes disposed of in a new, replacement, or laterally expanded landfill or impoundment that meets the minimum technology requirements (double liner and leachate collection)?

\_\_\_\_ Yes      \_\_\_\_ No

6. Does the facility have notices [268.7(a)(3)] and records of disposal for disposed wastes that are subject to a national capacity variance, case-by-case extensions [268.5], or no migration petitions [268.6]?

\_\_\_\_ Yes      \_\_\_\_ No      ☒ NA

7. What is the volume of the restricted wastes disposed of to date?

~~See~~ Volume not known. Result of special investigation unit investigation.

8. If the facility has a case-by-case extension, is the facility making progress as described in progress reports?

\_\_\_\_ Yes      \_\_\_\_ No      ☒ NA

## APPENDIX A

### SOLVENT IDENTIFICATION CHECKLIST

1. Does the handler generate any of the following F001 constituents (i.e., spent halogenated solvents used in degreasing) as a result of being used in the process either in pure form or commercial grade?

tetrachloroethylene	<input type="checkbox"/> Yes	<input type="checkbox"/> No
trichloroethylene	<input type="checkbox"/> Yes	<input type="checkbox"/> No
methylene chloride	<input type="checkbox"/> Yes	<input type="checkbox"/> No
1,1,1-trichloroethane	<input type="checkbox"/> Yes	<input type="checkbox"/> No
carbon tetrachloride	<input type="checkbox"/> Yes	<input type="checkbox"/> No
chlorinated fluorocarbons	<input type="checkbox"/> Yes	<input type="checkbox"/> No

2. Does the handler generate any of the following F002 constituents (i.e., spent halogenated solvents) as a result of being used in the process either in pure form or commercial grade?

tetrachloroethylene	<input type="checkbox"/> Yes	<input type="checkbox"/> No
trichloroethylene	<input type="checkbox"/> Yes	<input type="checkbox"/> No
methylene chloride	<input type="checkbox"/> Yes	<input type="checkbox"/> No
1,1,1-trichloroethane	<input type="checkbox"/> Yes	<input type="checkbox"/> No
chlorobenzene	<input type="checkbox"/> Yes	<input type="checkbox"/> No
trichlorofluoromethane	<input type="checkbox"/> Yes	<input type="checkbox"/> No
1,1,2-trichloro-1,2,2-trifluoroethane	<input type="checkbox"/> Yes	<input type="checkbox"/> No
ortho-dichlorobenzene	<input type="checkbox"/> Yes	<input type="checkbox"/> No

3. Does the handler generate any of the following F003 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

xylene	<input type="checkbox"/> Yes	<input type="checkbox"/> No
acetone	<input type="checkbox"/> Yes	<input type="checkbox"/> No
ethyl acetate	<input type="checkbox"/> Yes	<input type="checkbox"/> No
ethyl benzene	<input type="checkbox"/> Yes	<input type="checkbox"/> No
ethyl ether	<input type="checkbox"/> Yes	<input type="checkbox"/> No
methyl isobutyl ketone	<input type="checkbox"/> Yes	<input type="checkbox"/> No
n-butyl alcohol	<input type="checkbox"/> Yes	<input type="checkbox"/> No
cyclohexanone	<input type="checkbox"/> Yes	<input type="checkbox"/> No
methanol	<input type="checkbox"/> Yes	<input type="checkbox"/> No

If the F003 waste stream has been mixed with a solid waste, does the resultant mixture exhibit the ignitability characteristic?

☐ Yes    ☐ No

4. Does the handler generate any of the following F004 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

cresols and cresylic acid

☐ Yes ☐ No

nitrobenzene

☐ Yes ☐ No

5. Does the handler generate any of the following F005 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

toluene

☐ Yes ☐ No

methyl ethyl ketone

☐ Yes ☐ No

carbon disulfide

☐ Yes ☐ No

isobutanol

☐ Yes ☐ No

pyridine

☐ Yes ☐ No

6. Are any of the constituents listed in questions 1 through 5 used for their "solvent" properties -- that is to solubilize (dissolve) or mobilize other constituents? The following questions will be helpful in confirming this determination.

- (a) Are the constituents used as chemical carriers?

☐ Yes ☐ No

If yes, list the constituents.

\_\_\_\_\_  
\_\_\_\_\_

- (b) Are the constituents used for degreasing/cleaning?

☐ Yes ☐ No

If yes, list the constituents.

\_\_\_\_\_  
\_\_\_\_\_

- (c) Are the constituents used as diluents?

☐ Yes ☐ No

If yes, list the constituents.

\_\_\_\_\_  
\_\_\_\_\_

- (d) Are the constituents used as extractants?

☐ Yes ☐ No

If yes, list the constituents.

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(e) Are the constituents used for fabric scouring?

\_\_\_\_Yes \_\_\_\_No

If yes, list the constituents.

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(f) Are the constituents used as reaction and synthesis media?

\_\_\_\_Yes \_\_\_\_No

If yes, list the constituents.

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If the responses to questions 1 through 6 led the inspector to believe that the waste may be an F-solvent, answer question 7.

7. Are any of the above constituents spent solvents? (A solvent is considered "spent" when it has been used and is no longer usable without being regenerated, reclaimed, or otherwise reprocessed.)

\_\_\_\_Yes \_\_\_\_No

8. If the waste is a mixture of constituents as determined in questions 1 through 6, give the concentration before use of all the constituents in the solvent mixture/blend. For example:

5%	methylene chloride
2%	trichloroethylene
25%	1,1,1-trichloroethane
<u>68%</u>	mineral spirits
100%	

If the waste stream is a mixture containing a total of 10% or more (by volume) of one or more of the F001, F002, F004, or F005 listed constituents before use, it is a listed waste.

With respect to the F003 solvent wastes, if, before use, the waste stream is mixed and contains only F003 constituents, it is a listed waste. For example:

33%	acetone
16%	methanol
<u>51%</u>	ethyl ether
100%	

If the waste stream is a mixture containing F003 constituents and a total of 10% or more of one or more of the F001, F002, F004, and F005 listed constituents before use, it is a listed waste. For example:

50%	xylene (F003)
12%	TCE (F001)
<u>38%</u>	mineral spirits
100%	

If in light of the above, the handler appears to be generating F001 - F005 hazardous wastes, refer this facility to the enforcement official for followup actions verifying the use of solvents at the facility.

**APPENDIX B  
TREATMENT STANDARDS FOR F-SOLVENTS**

F001-F005 SPENT SOLVENTS	CONCENTRATION (IN MG/L)	
	WASTEWATERS	OTHER WASTES
Acetone	0.05	0.59
N-butyl	5.0	5.0
Carbon disulfide	1.05	4.81
Carbon tetrachloride	.05	.96
Chlorobenzene	.15	.05
Cresols (and cresylic acid)	2.82	.75
Cyclohexanone	.125	.75
1,2-dichlorobenzene	.65	.125
Ethyl acetate	.05	.75
Ethyl benzene	.05	.053
Ethyl ether	.05	.75
Isobutanol	5.0	5.0
Methanol	.25	.75
Methylene chloride	.20	.96
Methylene chloride (from the pharmaceutical industry)	12.7	.96
Methyl ethyl ketone	0.05	0.75
Methyl isobutyl ketone	0.05	.33
Nitrobenzene	0.66	0.125
Pyridine	1.12	0.33
Tetrachloroethylene	0.079	0.05
Toluene	1.12	0.33
1,1,1-Trichloroethane	1.05	0.41
1,2,2-Trichloro 1,2,2-trifluoroethane	1.05	0.96
Trichloroethylene	0.062	0.091
Trichlorofluoromethane	0.05	0.96
Xylene	0.05	0.15

Wastes shipped to:

A

TSD NAME LOCATION EPA ID NO.	TYPE OF FACILITY T/D METHODS	WASTE CODE	WASTE QUANTITY	COMMENTS (shipment dates, waste descriptions, etc.)
------------------------------------	------------------------------------	---------------	-------------------	--



**D. Corrective  
Action**



**U.S. ENVIRONMENTAL PROTECTION AGENCY**

**TECHNICAL ENFORCEMENT SUPPORT**

**AT**

**HAZARDOUS WASTE SITES**

**TES X**

**CONTRACT NO. 68-W9-0007**

**WORK ASSIGNMENT NO. R05043**

**INTERIM FINAL**

**PRELIMINARY REVIEW/VISUAL SITE INSPECTION (PR/VSI) REPORT**

**FOR**

**RCRA FACILITY ASSESSMENT (RFA)**

**AT**

**MORITZ, INC.**

**MANSFIELD, OHIO**

**U.S. EPA REGION V**

**METCALF & EDDY, INC.**

**PROJECT NO. 152043-0012-626**

**WORK PERFORMED BY:**

**METCALF & EDDY, INC.**

**2800 CORPORATE EXCHANGE DRIVE, SUITE 250  
COLUMBUS, OHIO 43231**

**July 1992**

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## EXECUTIVE SUMMARY

At the request of U.S. EPA, Metcalf & Eddy (M&E) initiated a RCRA Facility Assessment (RFA) of the Moritz Incorporated facility in Mansfield, Ohio. M&E conducted the first two steps in the RFA, the Preliminary Review and Visual Site Inspection (PR/VSI). The purpose of the PR/VSI is to summarize available information about the site and to assist U.S. EPA in recommending further steps in the corrective action process.

As part of the PR/VSI conducted at the request of U.S. EPA, M&E conducted a preliminary review of federal and state file material for Moritz, Inc. (OHD982218489) and conducted a Visual Site Inspection (VSI) of the facility in order to summarize available information concerning the site.

Moritz, Inc. is located at 400 Park Avenue East in Mansfield, Ohio. The facility fabricates horse and livestock trailers. RCRA Land Disposal Restriction Inspections (October 27, 1988 and October 31, 1989) and a Comprehensive Groundwater Monitoring Evaluation (December 21, 1988) conducted by Ohio EPA revealed violations of Federal and State hazardous waste laws with the disposal of solvents and paints at the facility. A closure plan for the site, submitted in May, 1989, was found deficient by Ohio EPA.

The VSI was conducted on August 21, 1990, following review of U.S. EPA and Ohio EPA files. One Solid Waste Management Unit (SWMU), a Hazardous Waste Land Disposal Unit, was tentatively identified, based on the file information. Based on the VSI, an Area of Concern was also identified - Main Entrance/Loading Dock Area.

**TABLE ES-1**

**MORITZ, INC.  
MANSFIELD, OHIO  
CURRENT SOLID WASTE MANAGEMENT UNITS**

<b>SWMU</b>	<b>OPERATIONAL DATES</b>	<b>RELEASE HISTORY</b>
Hazardous Waste, Land Disposal Unit	Unknown - May 1987	Yes, dates unknown but probably until 1987
Main Entrance/Loading Dock Area	1980 - Present	Disposal of rainwater/ floor sweepings into soil.

**PRELIMINARY REVIEW/VISUAL SITE INSPECTION (PR/VSI) REPORT**  
**RCRA FACILITY ASSESSMENT (RFA)**

**FACILITY NAME:** MORITZ, INC.  
400 PARK AVENUE EAST  
MANSFIELD, OHIO

**LATITUDE:** N 40° 45' 33"

**LONGITUDE:** W 82° 30' 08"

**SITE CONTACT:** JAMES BOYD

**PHONE:** 419/522-2323

**EPA ID #:** OHD982218489

## **1.0 INTRODUCTION**

This section of the RCRA Facility Assessment (RFA) report covers the purpose and scope of the RFA process. It also describes the other sections of this report.

### **1.1 Background**

This report was prepared by Metcalf & Eddy, Inc. under the Technical Enforcement Support (TES) X contract at the request of the United States Environmental Protection Agency (U.S. EPA) Region V. It describes the Preliminary Review (PR) of file material for the Moritz, Incorporated (Inc.) facility and the Visual Site Inspection (VSI) of the facility. These are the first two steps in conducting a Resource Conservation & Recovery Act (RCRA) Facility Assessment (RFA). The RFA is the first phase of the RCRA corrective action program and consists of a PR, VSI and, if appropriate, a Sampling Visit (SV). The purpose of this report is to summarize available information about the site and to assist the U.S. EPA in recommending further steps in the corrective action process.

The 1984 Hazardous and Solid Waste Amendments (HSWA) to the Resource Conservation and Recovery Act (RCRA) provide new authorities for the U.S. Environmental Protection Agency (EPA) to compel owners and operators of hazardous waste treatment, storage and disposal facilities to take corrective actions for releases of hazardous wastes and hazardous constituents. These authorities apply to releases at facilities subject to the permitting requirements of RCRA Section 3005(e) and at facilities applying for RCRA permits. These Amendments require EPA to address the need for corrective action for previously unregulated releases to air, surface water, soil, and ground water, and to address the generation of subsurface gas. Section 3004(u) of RCRA allows EPA to require corrective actions after permit issuance through a schedule of compliance. Section 3008(h) allows EPA to require corrective actions through an enforcement action.

This report summarizes file information related to releases of hazardous waste at the Moritz Incorporated facility located in Richland County, Ohio (see Figure 1). Releases into all media are considered, including ground water, air, surface water and soils, and subsurface gas releases. All areas of potential release are considered, but the focus is on SWMUs.

A Solid Waste Management Unit (SWMU) is defined as any discernable unit where solid wastes have been placed at any time from which hazardous constituents might migrate, regardless of whether the unit was intended for the management of a solid or hazardous waste.

The SWMU definition includes the following:

- RCRA regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells.
- Closed and abandoned units.
- Recycling units, wastewater treatment units and other units that EPA has generally exempted from standards applicable to hazardous waste management units.
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents such as wood preservative treatment dripping areas, loading or unloading areas, or solvent washing areas.

An Area of Concern (AOC) is defined as any area where a release to the environment of hazardous waste or constituents has occurred or is suspected to have occurred on a non-routine or non-systematic basis. This includes any area where such a release in the future is judged to be a strong possibility. The list and description of the SWMUs and AOCs in the report may not be all inclusive.

Furthermore, the fact that a SWMU was not identified in the report does not affect U.S. EPA's authority for corrective action for SWMUs which may not be contained in the report.

The central purpose of an RFA is to identify releases or potential releases requiring further investigation. According to EPA's RFA Guidance Document, the four purposes of an RFA are as follows:

1. To identify and gather information on releases at RCRA-regulated facilities.
2. To evaluate SWMUs and other AOCs for releases to all media and to evaluate regulated units for releases to media other than ground water.
3. To make preliminary determinations regarding releases of concern and the need for further actions and interim measures at the facility.
4. To screen from further investigations those SWMUs that do not pose a threat to human health and the environment.

Moritz, Inc., located in Mansfield, Ohio, produces livestock trailers. The facility generates wastes including paint, solvents and solvent-containing rags as a result of the trailer fabrication. Ohio EPA inspections and investigations have revealed disposal of this waste material into and onto the ground, dumpsters and unknown locations at the facility.

M&E performed a file review of the Moritz, Inc. files at the Ohio EPA office located in Bowling Green, Ohio, and the U.S. EPA Region V RCRA files located in Chicago, Illinois. One SWMU, a Hazardous Waste Land Disposal Unit, was tentatively identified based on the file information. M&E performed the VSI on August 21, 1990, to verify the existence of the SWMU and to identify any other possible SWMUs or AOCs. The M&E site inspection team consisted of Ms. Cathy Pickrel and Ms. Lisa Allinger. Inspection personnel were met by Mr. James Boyd, company representative for Moritz, Inc. Based on the VSI, the number of identifiable SWMUs was changed to two. An AOC was identified when workers were observed to be disposing of rainwater and water from the floor of the facility onto the ground outside the main entrance to the building (See Table 1).

## **1.2 Permit History**

Moritz, Inc. submitted a Part A application sometime prior to October 1989. No Part B has been submitted.

**TABLE 1**

**MORITZ, INC.**

**MANSFIELD, OHIO**

**SUMMARY OF SOLID WASTE MANAGEMENT UNITS**

<b>UNIT NAME</b>	<b>REGULATORY STATUS</b>	
	<b>BEFORE VSI</b>	<b>AFTER VSI</b>
Hazardous Waste, Land Disposal Unit	SWMU	SWMU
Main Entrance/Loading Dock Area	---	AOC

### **1.3 Enforcement History**

The Ohio Environmental Protection Agency (Ohio EPA) has conducted regulatory enforcement activities for this site. An initial Special Investigation Unit site inspection on May 7, 1987 was performed by the Ohio EPA in response to a complaint concerning the dumping of paints and solvents at the site (2). Soil sampling results indicated that hazardous wastes had been disposed of at the facility. Ohio EPA advised Moritz, Inc. that they were in violation of Federal and Ohio Hazardous Waste Laws on May 22, 1987, February 9, 1988, February 26, 1988 and August 30, 1988 (2, 4, 5, 7). The site was identified as a land disposal facility by the Ohio EPA on August 30, 1988 (7).

RCRA Land Disposal Restriction Inspections (October 27, 1988 and October 31, 1989) and a Comprehensive Groundwater Monitoring Evaluation (December 21, 1988) conducted by Ohio EPA also revealed violations of Federal and State of Ohio Hazardous Waste Laws in association with the disposal of solvents and paints at the Moritz, Inc. facility (10, 21, 11). Two meetings involving representatives of the Office of the Attorney General, the Ohio EPA, and Moritz, Inc., were held on January 13, 1989 and September 26, 1989 at which Moritz, Inc. was directed to provide the Ohio EPA with a closure plan (13, 19). A closure plan for the site was submitted by Moritz, Inc. in May, 1989 and subsequently found deficient by the Ohio EPA (16, 28). The U.S. EPA issued a Notice of Violation for the Moritz, Inc. facility on June 6, 1990 because of noncompliance with RCRA hazardous waste management requirements (29). The violations in respect to land disposal restriction section were identified as failure to determine whether the waste exceeds treatment standards (40 CFR 268.7(a) and (C)(2), failure to maintain a waste analysis plan to include 40 CFR 268 requirements (40 CFR 265.13) and failure to retain on-site copies of documents required by 40 CFR 268.7 (a)(b) and (C)(1).

### **1.4 Project Description and Report Format**

This RFA report consists of five sections and three appendices. The information contained in the report is designed to give the reader a thorough description of site-specific and area conditions at the facility, approximately 7,000 square feet, and to provide information on individual units at the site. The following sections of the report are outlined below.

Section 2.0 describes the facility and its operations by providing general facility information, process information, waste management practices, and regulatory status of SWMUs at the site.

Section 3.0 provides information on the general environmental setting in the immediate area and in the region where the facility is located. The climate, surface water, ground water, soils, geology, and land use in the vicinity of the site are described in this section.

Section 4.0 presents unit-specific information on SWMUs. For each SWMU description, status, waste type(s) and management, evidence of releases, summary of remedial actions, and suggested actions are provided.

Section 5.0 provides conclusions and recommendations, including a summary table for all SWMUs identified during the RFA.

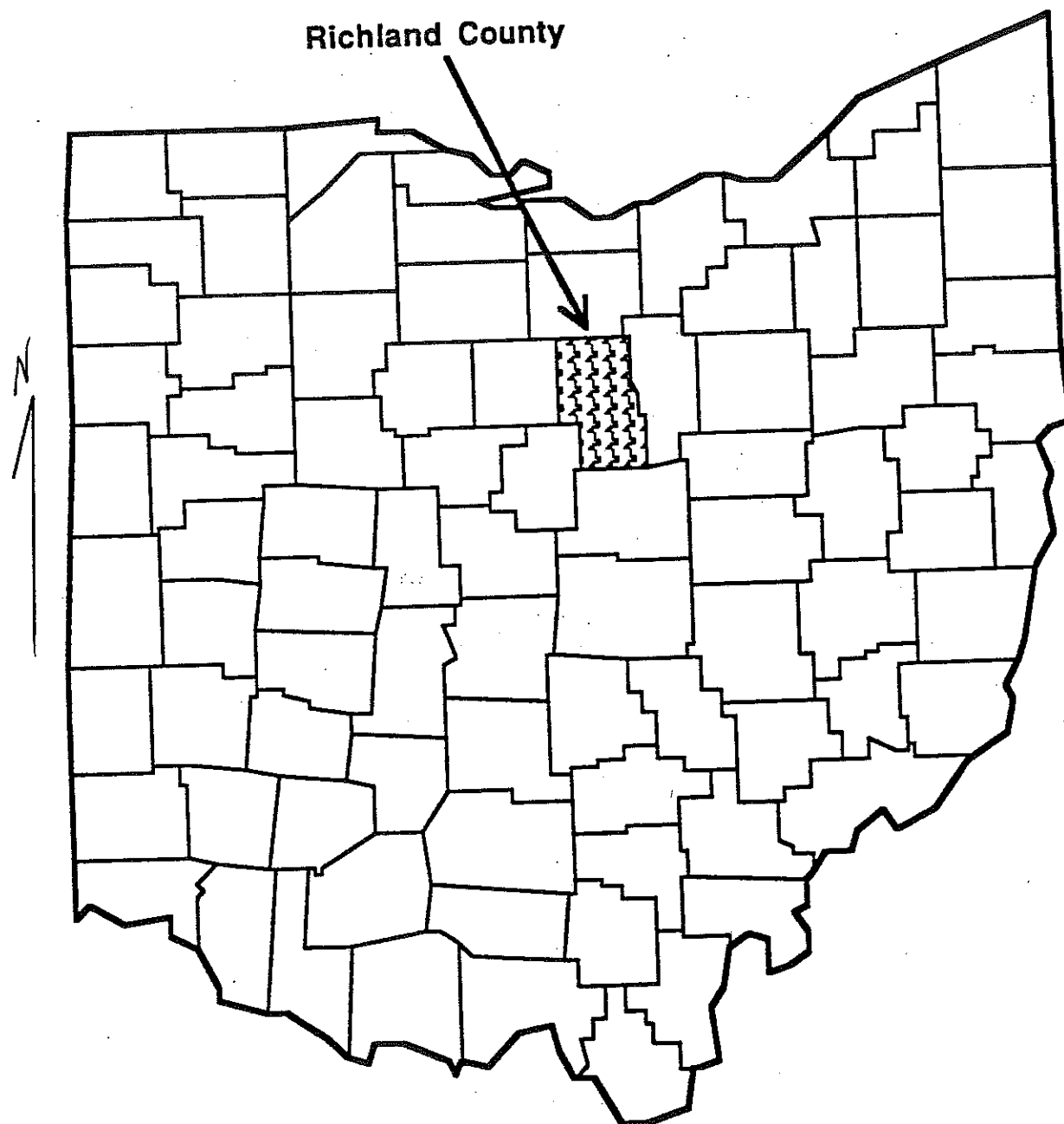
Finally, the Appendices contain photographs taken during the visual site inspection, analytical data obtained, if available, and field notes.

## **2.0 GENERAL DESCRIPTION OF FACILITY AND PROCESSES**

Section 2 includes a general description of the facility, its processes, and the environmental setting of the plant. The Moritz, Inc. facility fabricates livestock trailers. The production process involves the cutting, shaping, assembly, and painting of the metals used in the overall manufacture of the trailers. Moritz, Inc. has been in operation for 10 years. One area of the facility, approximately 7,000 square feet, designated a hazardous waste land disposal unit, is of concern due to the past practices of disposal of paint wastes, solvents and petroleum distillates onto the ground surface in the area. This report provides information concerning pollutant releases to the groundwater, surface water, air, subsurface (gas), and soil; available monitoring data; and potential receptors primarily associated with the waste disposal unit.

### **2.1 Facility Location and Operation**

Moritz, Inc. is a livestock trailer fabrication company located in the eastern portion of Mansfield, Section 22, Mansfield Township, in Richland County, Ohio (see Figure 1). Mansfield has an estimated population in excess of 55,000. The facility address is 400 Park Avenue East (shown in Figure 2). The area surrounding Moritz, Inc. is largely industrial. Approximately 50 horse trailers per month are produced at the facility (16). The fabrication process involves shaping and welding of steel, preparing trailers for painting, and finally spray painting the trailers. Wastes generated as a result of trailer fabrication include paints, solvents (xylene, toluene, aromatic petroleum distillates) and solvent-containing cleaning rags (11). Site inspections and evaluations performed by the Ohio EPA site indicate that paint wastes, waste solvents and other unknown materials were disposed of into and onto the ground, dumpsters and other unknown locations at the facility (2, 4, 5, 8-12). The



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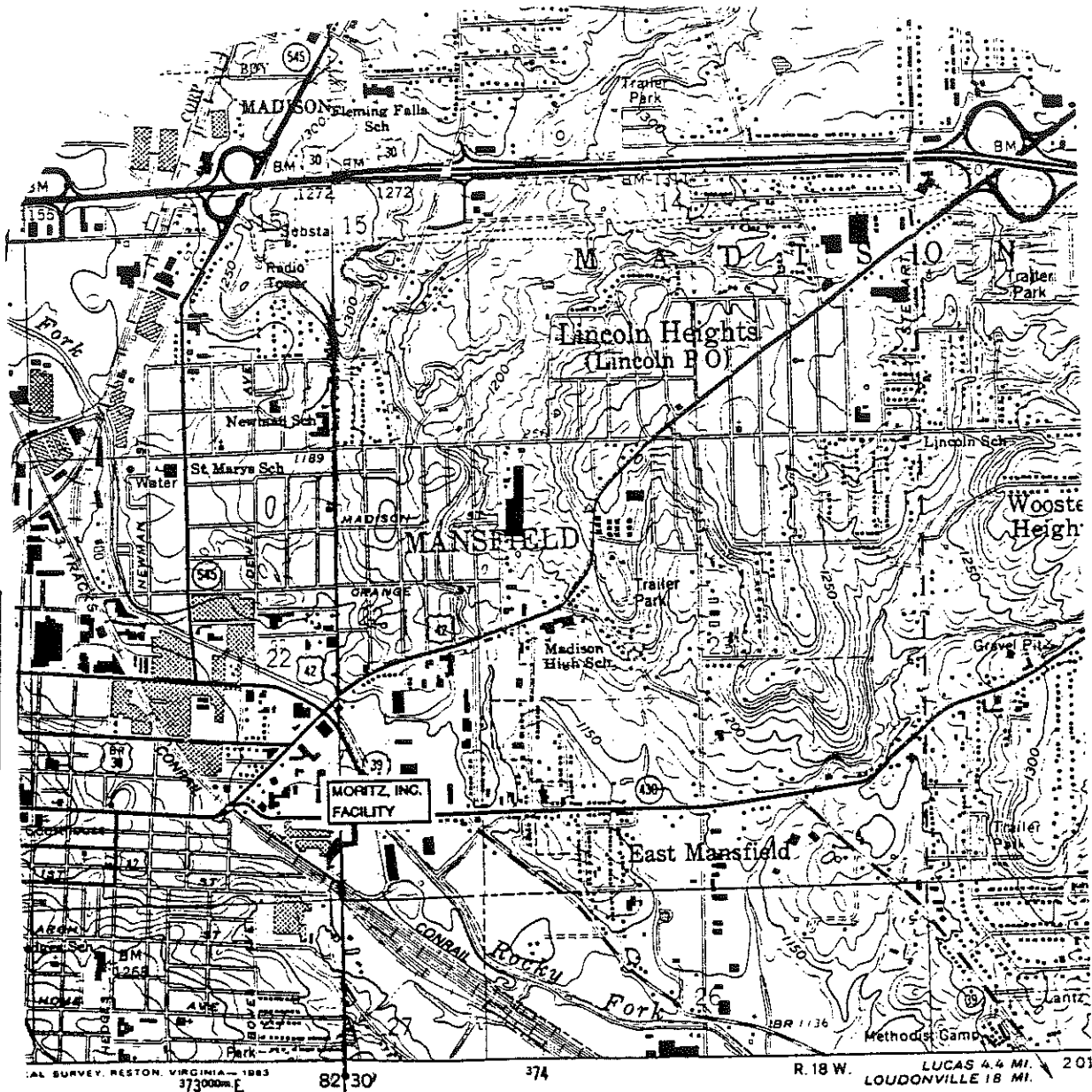


OHIO COUNTY MAP

· RICHLAND COUNTY

Project Number  
152043-0012-626

Figure 1



Mapped, edited, and published by the Geological Survey  
Control by USGS and NOS/NOAA



SITE VICINITY MAP  
MORITZ, INC.  
SOURCE: MANSFIELD NORTH QUADRANGLE  
7.5 MINUTE SERIES

Project Number  
152043-0012-626

Figure 2

dumping was mainly done in the southern part of the facility (2). Results of an Interim Status Inspection and a RCRA Land Disposal Restriction Inspection conducted by Ohio EPA on November 9, 1988 and October 31, 1989, respectively, indicated that wastes were manifested off-site to a treatment storage disposal facility (TSD) (11, 23).

### **3.0 ENVIRONMENTAL SETTING**

The environmental setting of the Moritz, Inc. facility includes a description of the geology, hydrogeology, and climate/meteorology of Richland County, Ohio.

#### **3.1 Geology**

The Moritz, Inc., facility is located on the Allegheny Plateau province which slopes toward Rocky Fork stream valley(11). The vicinity of the site is characterized by topographic elevations ranging from 1150 to 1160 feet above average mean sea level. The site is situated in an industrial area classified as Urban Land (i.e., covered by buildings, pavement, etc.). Lobdell silt loam occurs to the east, northwest and south of the area. The Lobdell series are comprised of level, moderately well-drained soils formed in alluvial sediments. Glacial deposits overlying sandstone and shale bedrock are found in the area of the site. The glacial outwash deposits exist as valley trains and low terraces on the edge of the Rocky Fork Valley. Sand and gravel partially filled the preglacial valley and are identifiable in local well logs at depths ranging from 8 to 81 feet. The Hayesville till is located adjacent to the southwest side of the site at a depth of 7 to 10 feet. The Hayesville is comprised of a massive compact, dark grey till consisting of silt, clay and pebbles. The bedrock underlying the site is comprised of the Black Hand Member and underlying Pleasant Valley Member of the Mississippian Cuyahoga Formation. The Black Hand Member is resistant, coarse-grained, lens shaped sandstone. Along the Rocky Fork stream valley, the Black Hand Member is comprised of thin-bedded grey siltstones and shales. Local well logs indicated sandstone occurs at depths ranging from 3 to 73 feet while depth to the shale ranges from 98 to 107 feet (11).

#### **3.2 Hydrogeology**

No hydrogeologic studies have been performed in relation to the Moritz, Inc. site (11). However, regional hydrology consists of sand and gravel deposits in and around the Rocky Fork Valley which yield between 200 and 500 gpm at depths of 120 to 275 feet. The bedrock sandstones and shales of the Cuyahoga Group yield up to 250 gpm at 350 feet. It is likely that the Rocky Fork is hydraulically connected to the regional sand and gravel aquifer system. Because no hydrogeologic work has been initiated to date, the direction of local groundwater flow has not been documented (11).

Public water supply wells for the City of Mansfield are screened in sand and gravel at intervals of 100 to 120 feet within 2 miles northeast of the facility (in Mansfield Township Section 26) (11). Private wells in Mansfield Township Sections 21 and 22 are installed in sandstone and shale and overlying sands and gravels at depths of 30 to 87 feet (11).

Surface water in the site vicinity consists of Rocky Fork Creek, which is east of the site, which drains south into the Mohican River (11). The Mohican River, in turn, drains into the Ohio River.

### **3.3 Climate/Meteorology**

The climate and meteorology of Richland County is typical of Central Ohio. Precise meteorological data were not obtained, but climatological maps prepared by the National Climatic Data Center indicate that the average rainfall is approximately 38 inches. The region is generally well ventilated with winds predominantly from the south and southwest. The annual average temperature is about 53½F.

### **3.4 POLLUTANT RELEASES INTO GROUND WATER**

#### **3.4.1 Monitoring Data**

No groundwater monitoring has been performed at the Moritz, Inc. site to date.

#### **3.4.2 Potential Receptors**

Public water supply wells for the City of Mansfield are located within 2 miles of the Moritz, Inc. facility. Private wells also occur in Mansfield Township Sections 21 and 22 (11). Thus, any residents or other users (i.e., on-site workers, workers at other industries, schools, etc.) drawing groundwater from these sources may be potential receptors.

### **3.5 POLLUTANT RELEASES INTO SURFACE WATER**

#### **3.5.1 Monitoring Data**

No surface water sampling has been reported for the Moritz, Inc. site.

#### **3.5.2 Potential Receptors**

Potential receptors would be biota of surrounding surface waters and people who make use of the surrounding surface waters.

### **3.6 POLLUTANT RELEASES INTO AIR**

In 1984, an application was filed with the Ohio EPA for a permit to operate an air contaminant source at the Moritz, Inc. facility (under the company name, Frank Moritz & Sons Co.) (1). Fugitive dust emission sources were identified as the plant roadways and parking areas, aggregate storage piles, material handling, and concrete batching plants.

#### **3.6.1 Monitoring Data**

No air monitoring data are available for the Moritz, Inc. site.

#### **3.6.2 Potential Receptors**

Potential receptors include on- and off-site workers, area residents, and attendees at local schools. Environmental receptors may include local biota and surface water.

### **3.7 POLLUTANT RELEASES INTO SOILS**

Pollutant releases into the soils at the Moritz, Inc. site have been documented in association with disposal of waste solvents and paints in an area outside the paint building (to the south of the facility, see Figure 3).

#### **3.7.1 Monitoring Data**

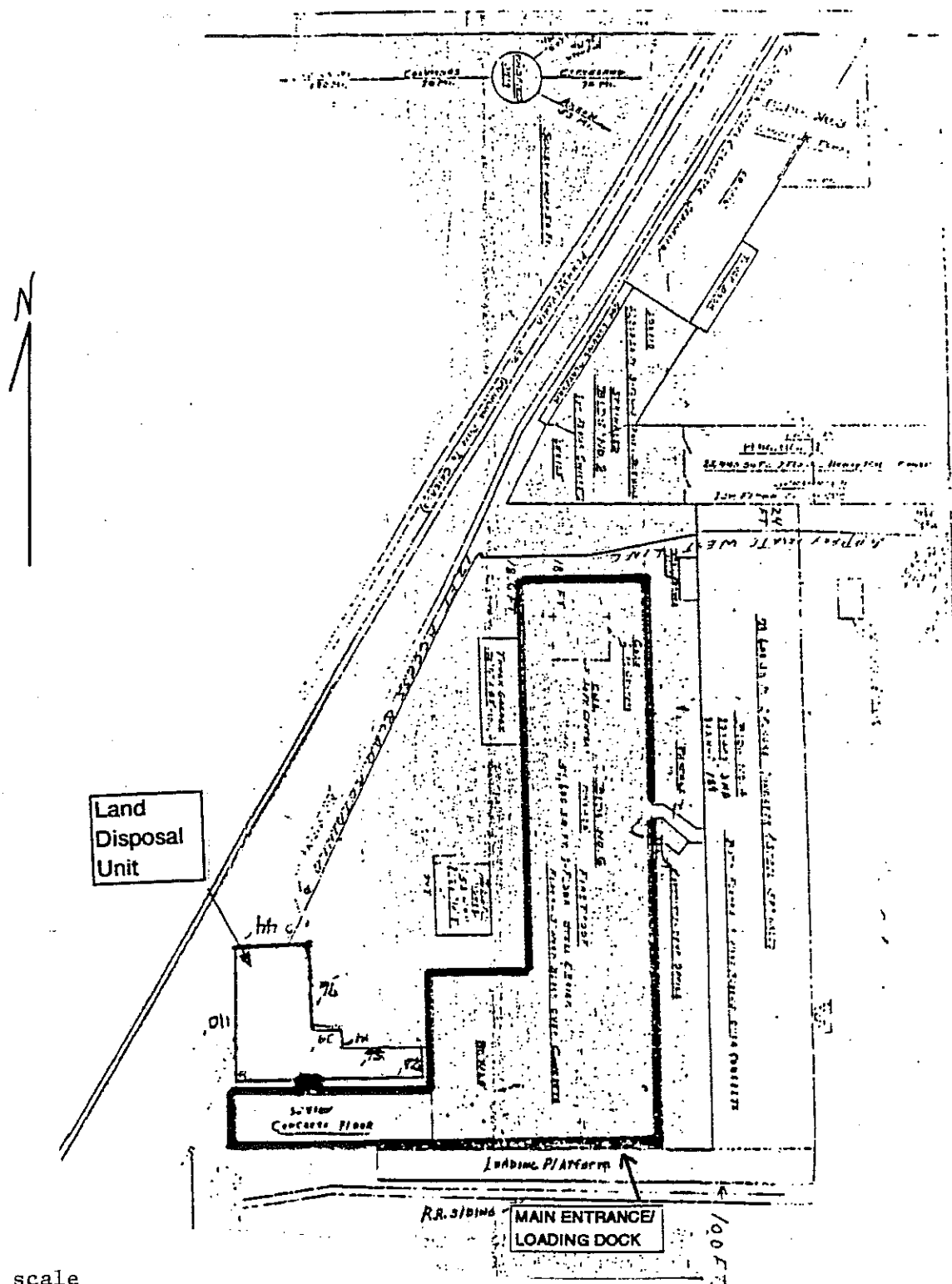
Waste solvents and paints resulting from the livestock trailer fabrication process are currently manifested off-site to a TSD (21). However, past releases (toluene, xylene, petroleum distillate and paint wastes) into the soils have been reported in the area outside the paint building (2,4,11). Soil samples have been collected on two different occasions by Ohio EPA from the area where solvent and paint wastes were disposed of onto the soils. On May 7, 1987 an Ohio EPA inspection of the disposal area revealed visual evidence of stained soils and the presence of organic hydrocarbon compound contamination (h-nu photo analyzer results) (2). Ten soil samples were also collected during the inspection (2, 3, 4). Laboratory analyses showed that four samples were hazardous due to ignitability, one sample contained Extraction Procedure (EP) toxic levels of lead (maximum concentration = 3.54 mg/l), and four samples contained solvents including toluene and xylenes (maximum weights per volume = 19.1% and 50.7%, respectively; see Table 2).

In May, 1987 a composite soil sample comprised of soils from 25 locations around the paint building was obtained by a Moritz, Inc. contractor, 7-7, Inc. Laboratory analysis of the sample showed xylenes in the soil at 96 mg/kg (6). No other volatile organic compounds were found above the laboratory

Table 2 - Summary of Soil Sampling Results for the Hazardous Waste Land Disposal Unit [Collected 05/07/90 by OEPA (2,3)]

SAMPLE NUMBER	SAMPLE DESCRIPTION	LOCATION	PARAMETERS	ANALYTIC RESULTS
1	Dry floor sweepings(red & multi-colored paint).	Pile outside	EPTOX - Lead	3.54 mg/l
2	Dried green paint in soil.	Outside	EPTOX - Lead	<0.5 mg/l
3	Soil at 60 feet.	Chemical Building	HNu Reading	65 ppm
Same	Soil at 60 feet.	Chemical Building	Solvent Scan	0 detected
4	Soil from the fence area.	Next to Caddy.	Solvent Scan: -VM & p-Naphtha -Toluene -Xylene -High flash Naphtha -Flash point	0.2 % W/W 0.2 % W/W 1.3 % W/W 0.7 % W/W <80 F
5 or 5A	Buried red paint.	Near fence adjacent to Sample 4.	Solvent Scan: -Toluene -Xylene -Mineral Spirits -Flash point	0.5 % W/W 7.0 % W/W 6.0 % W/W 105 F
5B	Red paint (buried near fence).	Near Sample 4.	EPTOX - Lead	<0.5 mg/l
6	Soil sample.	Fence near building closer than Sample 4.	Solvent Scan: -VM & p-Naphtha -Toluene -Xylene -High flash Naphtha -Flash point	0.2 % W/W 0.1 % W/W 0.5 % W/W 0.1 % W/W <80 F
7A	Fresh floor sweeping.	Paint room.	Solvent Scan: -Xylene -High flash Naphtha -Flash point	0.84 mg/l 1.24 mg/l >230 F
7B	Fresh floor sweepings.	Paint room.	EPTOX - Lead	<0.5 mg/l
8	Liquid from 5 gallon paint can.	Outside Chemical Building	Solvent Scan: -VM & p-Naphtha -Toluene -Xylene -High flash Naphtha -Flash point	0.5 % W/V* 8.7 % W/V 50.7 % W/V 10.4 % W/V <75 F
9	Liquid from drip bucket.	Underneath xylene drum.	Solvent Scan: -VM & p-Naphtha -Toluene -Xylene -High flash Naphtha -Flash point	20.6 % W/V 19.1 % W/V 37.8 % W/V 4.3 % W/V <75 F
10	Soil sample.	Adjacent to the Chemical Building.	Solvent Scan: -VM & p-Naphtha -Toluene -Xylene -High flash Naphtha -Flash point	1.9 % W/V 2.4 % W/V 2.4 % W/V 2.5 % W/V <72 F

\* Abbreviations: W/W = Weight per weight; W/V = Weight per volume.



not to scale



LOCATION OF  
HAZARDOUS WASTE LAND DISPOSAL UNIT  
MORITZ, INC.  
MANSFIELD, OHIO

Project Number  
152043-0012-626

Figure 3

detection limit. No exceedances of EP toxic limits were found for lead or any of the other EP toxic analytes.

### **3.7.2 Potential Receptors**

Receptors may include area residents, students or workers who come into contact with these media. Potential receptors may include plants living in the soil, animals living in the soil, and animals.

## **3.8 RELEASES OF GASEOUS POLLUTANTS INTO SUBSURFACE SOILS**

Waste solvents and paints resulting from the livestock trailer fabrication process are currently manifested off-site to a TSD (21). However, past waste disposal activities involving the dumping of wastes onto the soils have been reported in the area outside the paint building. Residual volatile or semivolatile compounds may have been a source for gaseous pollutants to migrate into subsurface soils. The solvents and petroleum distillates disposed of in the area outside the paint building may constitute potential sources for past releases of gaseous pollutants into subsurface soils.

### **3.8.1 Monitoring Data**

Soil samples have been collected on two different occasions by Ohio EPA from the area where solvent and paint wastes were disposed of onto the soils. On May 7, 1987 an Ohio EPA inspection of the disposal area revealed visual evidence of stained soils and the presence of organic hydrocarbon compound contamination (h-nu photo analyzer results) (2). Ten surface soil samples were also collected during the inspection (2, 3, 4). Laboratory analyses showed that four samples were hazardous due to ignitability, one sample contained Extraction Procedure (EP) toxic levels of lead (maximum concentration = 3.54 mg/l), and four samples contained solvents including toluene and xylenes (maximum weights per volume = 19.1% and 50.7%, respectively; see Table 1).

In May, 1987 a composite soil sample comprised of soils from 25 locations around the paint building was obtained by a Moritz, Inc. contractor, which is 7-7, Inc. Laboratory analysis of the sample showed xylenes in the soil at 96 mg/kg. No other volatile organic compounds were found above the laboratory detection limit. No exceedances of EP toxic limits were found.

### **3.8.2 Potential Receptors**

Contaminants in soils may migrate into the groundwater from subsurface soils. Direct contact with subsurface soils or gases from the soils by humans would not be likely unless the soils were disturbed (i.e., construction, other digging activities).

## **4.0 DESCRIPTION OF SOLID WASTE MANAGEMENT UNITS (SWMUs)**

At present, one solid waste management unit (SWMU) is identifiable at the Moritz, Inc. facility. The SWMU is a land disposal unit located outside the building in the southwest corner of the facility utilized for painting livestock trailers.

### **4.1 Unit Type: Hazardous Waste Land Disposal Unit.**

Regulatory Status: SWMU. Disposal of wastes in the area were stopped as of May, 1987 (2). The unit is not currently in operation. Waste solvents and paints are manifested to an off-site treatment, storage, or disposal facility (11, 21). A closure plan for the unit was submitted by Moritz, Inc. in May, 1989. The closure plan was found to be deficient by the Ohio EPA, April 13, 1990 (26). Both the Ohio EPA and the U.S. EPA have submitted Notices of Violation of state and federal regulations applicable to a generator, treatment, and/or storage and disposal of hazardous waste (November 16, 1989, June 16, 1990, respectively) in regard to the disposal unit. At the time of the VSI (September 21, 1990) it was indicated that a final closure plan for the facility had not been submitted to the Ohio EPA.

- A. Unit Description: The unit consists of the ground area immediately outside the paint building (see Figure 3). The disposal unit is approximately 7000 square feet in area (16). A fence surrounds the Moritz, Inc. facility. In addition, a fence surrounds the former disposal area such that entry into the area is limited to a door located on the back wall of the paint/paint storage room. The area appears to be covered by weeds. Photographs 1, 2, and 3 in Appendix 1 show the location of the former disposal area.
- B. Period of Operation: The exact period of operation of the waste disposal unit is unknown. At the time of the initial site inspection by the Ohio EPA in May, 1987, the owner reported that dumping activities had ceased (2).
- C. Waste Description: It has been reported that solvents (including toluene and xylenes), petroleum distillates, and paint wastes were disposed of in the unit (2, 11). Although the period of disposal activities at the unit is unknown, the livestock trailer fabrication process is

reported to generate less than 55 gallons per month of toluene and less than 55 gallons per month of xylene (16). The volume of paint wastes or petroleum distillates has not been estimated by facility personnel.

Soil sampling and analysis performed by the Ohio EPA indicated that toluene, xylene, mineral spirits, high flash point naphtha and lead were present in the soil (3).

- D. Release Controls: No formal release controls have been reported for the disposal unit. A fence surrounds the facility which would deter trespassers from entering upon the site. However, the fence surrounding the former disposal area is approximately waist-high and could easily be traversed. Weeds have grown on the site, thus providing cover which could mitigate wind-related erosion of contaminants in dusts.
- E. Release History: According to h-nu photo analyzer results organic hydrocarbon vapors were present in association with the soils of the unit in May, 1987 (2). Soil sampling results showed the presence of toluene, xylene, naphtha and lead (3). No other releases from the disposal unit have been definitively identified through sampling or monitoring of environmental media.
- F. Observations: The area has not been properly closed to ensure that future releases will not occur. No ground water monitoring wells have been installed.
- G. Sample Results: Results from surface soil sampling indicate elevated levels of lead (maximum concentration = 3.54 mg/l); toluene and xylenes (maximum weights per volume = 19.1% and 50.7%, respectively; see Table 1), mineral spirits, and high flash point naphtha in the surficial soil in this area.

#### **4.2 Unit Type: Main Entrance/Loading Dock Area.**

Regulatory Status: Area of Concern. On the day of the VSI (September 21, 1990) it was noted that facility employees were pouring milky colored liquids off the main entrance/loading dock onto the ground below the dock. The liquids were carried to the dock in 55 gallon drums. Mr. Jim Boyd of Moritz, Inc. indicated that the employees were disposing of rainwater which came into the facility through the leaking roof. The facility is notably lacking in any type of floor drainage system. Therefore, water leaking in through the roof accumulates on the floor below.

During the VSI it was observed that plastic sheets were suspended below the facility roof to catch the rainwater from the roof. Holes in the plastic allowed water to be funnelled to open drums placed

below the plastic. In addition, some rainwater fell directly to the floor. The water on the floor was then sponged up, placed in the barrels and poured off the loading dock. It is likely that water sponged from the floor may be contaminated.

- A. Unit Description: The area consists of the ground area immediately outside the main entrance/loading dock at the facility (see Figure 3). The area appears to be covered by gravel and weeds. Photographs 4 and 5 in Appendix 1 show the location of the former disposal area.
- B. Period of Operation: The initiation date of the disposal practices is unknown.
- C. Waste Description: Potential contaminants in the water may include solvents (toluene and xylenes), petroleum distillates, and paint wastes.
- D. Release Controls: No release controls have been reported for the disposal unit. Mr. Jim Boyd of Moritz, Inc. indicated that they were in the process taking bids for the repair of the roof on the facility.
- E. Release History: Information concerning past disposal of rainwater from the facility was not determined.
- F. Observations: The practice of disposing of collected rain leakage and water mopped from the floor obviously is tied to weather conditions. It was rainy on the day of the VSI, therefore drums of water were poured off the loading dock several times in the period of an hour.
- G. Sample Results: No sampling results specific to the disposal of the rainwater are available. However, the City of Mansfield did sample the catch basin located behind the loading dock for petroleum hydrocarbons and volatile organic compounds on February 21, 1990 (27). The sampling was performed in association with complaints of odors of petroleum hydrocarbons in the wastewater system. The concentrations for oil and grease analyses, total and hydrocarbon, were 3.6 mg/l and 3.2 mg/l, respectively. All of the volatile organic compounds were below detection limits with the exception of total xylenes, which was found at a concentration of 4.5 ug/l.

## 5.0 SUMMARY AND RECOMMENDATIONS

The principle environmental concern at the Moritz, Inc. facility centers on a land disposal unit located outside Building #6 where the painting of livestock trailers is performed. In the past, solvent, petroleum distillate, and paint wastes were disposed of onto the soil outside the Building #6. The amount of waste disposed of in the land disposal unit and the exact composition of the waste stream has not been definitively characterized. Sampling of environmental media associated with the facility has been limited to the sampling of soil in the disposal area and floor sweepings from the paint building. In addition, an area of concern at the Moritz, Inc. facility is the main entrance/loading dock area where rainwater from the roof and floor is captured in drums and is disposed of on rainy days.

The VSI verified the SWMU and area of concern and determined additional concerns that need to be addressed. Listed below are the recommended sampling points, parameters for analysis, and other actions necessary to complete the investigation. Table 3 provides a summary of SWMUs and suggested further action.

1. Hazardous Waste Land Disposal Unit - recommend soil sampling to determine the present concentrations of contaminants. Surficial and subsurface soils should be sampled. In addition, monitoring wells should be installed to: 1) determine whether contaminants have migrated from the soils to ground water, or 2) provide evidence that ground water contamination has not occurred in the past and will not occur in the future. TCLP analyses should be performed in addition to all compounds on the U.S. EPA Contract Laboratory Program's Target Compound List.
2. Main Entrance/Loading Dock Area - recommend that the disposal practices be halted immediately. An h-nu photo analyzer survey should be performed and surface soil samples should be collected in the area to determine whether contamination of area soils has occurred.

**TABLE 3**

**MORITZ, INC.  
MANSFIELD, OHIO  
SOLID WASTE MANAGEMENT UNITS SUMMARY**

<b>Solid Waste Management Units</b>	<b>Operational Dates</b>	<b>Release History</b>	<b>Suggested Further Action</b>
Hazardous Waste, Land Disposal Unit	Unknown-May 1987	Probably until 1987	Additional soil and groundwater samples outside facility in known developing area.
Main Entrance/ Loading Dock Area (AOC)	1980-Present	Disposal of rainwater/floor sweepings onto soil	Soil sampling

## **6.0 CONCLUSIONS**

The PR/VSI identified 1 SWMU and 1 Area of Concern at the Moritz, Inc. facility. Background information on the facility's location, operations, waste generating processes, release history, regulatory history, environmental setting, and receptors is presented in Sections 2.0 and 3.0. SWMU specific information such as the unit's description, dates of operation, wastes managed, release controls, release history, and observed conditions, is discussed in Section 4.0.

Following is a summary of environmental concerns at the facility. Table 2 identified the SWMU's at the Moritz, Inc. facility and suggested further actions.

### **SWMU 1 - Hazardous Waste Land Disposal Unit**

This unit was used for disposal of solvents, petroleum distillates, and paint wastes. Analysis of soil samples collected from this area indicated elevated levels of lead (maximum concentration - 3.54 mg/l) toluene and xylenes (maximum weights per volume 19.1% and 50.7% respectively), mineral spirits, and high flash point naphtha. Table 1 details the analytical results for sampling conducted in this area. There was great potential for release to all media during the operational life of this unit. The area is no longer used for disposal of solvents, petroleum distillates and paint wastes. There is no longer a potential for release. However, there is a great potential for contaminant transport to soil, ground water, and surface water. Contaminants could migrate through the soil into the sand and gravel aquifer system. Public and private wells may be impacted. Public water supply wells for the City of Mansfield are located within 2 miles northeast of the facility. Private wells also occur in the surrounding area although exact distances to these wells is not known.

Surface runoff of contaminants from the disposal area may be a potential release source for migration of contaminants into surface water. Surface drainage in the region is likely controlled by city sewers and drainage systems in parking lots and along roads (11).

It appears that the potential exists for fugitive dust entrainment at the site. Furthermore, the release of volatile compounds into the air appears likely in association with the use/disposal of solvents and paints at the facility.

**Area of Concern - Main Entrance/Loading Dock Area**

During the VSI, it was noted that facility employees were pouring milky colored liquids off the main entrance/loading dock onto the ground below the dock. it was explained by facility personnel this was rainwater that enters the facility through holes in the roof and is caught in 55-gallon drums and subsequently dumped off the dock. This also included water mopped off the floor.

Given the nature of business of Moritz, Inc., it is likely the water mopped up from the floor might be contaminated with solvents, petroleum distillates, and paints wastes. Hence, there is great potential for release to all media. Furthermore, there is great potential for contaminant transport to soil, ground water, and surface water. The effects of release from this unit could have much the same impact as releases from the Hazardous Waste Land Disposal Unit.

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**APPENDIX A**  
**PHOTOGRAPH LOG**



PHOTOGRAPH 1: Former hazardous waste land disposal unit. View from door of painting room.



PHOTOGRAPH 2: Former hazardous waste land disposal unit. View from the area outside the facility looking toward the painting room.



PHOTOGRAPH 3: Former hazardous waste land disposal unit. View from side of area looking toward the adjacent railroad tracks.



PHOTOGRAPH 4: Loading dock area of concern with drum used for rainwater disposal on dock.



PHOTOGRAPH 5: Loading dock area of concern.



PHOTOGRAPH 6: General area where catch basin for area is located.



PHOTOGRAPH 7: Storage area behind welding area. Empty fuel tank.



PHOTOGRAPH 8: Storage area behind welding area. empty fuel tank, waste metals and empty drums.



PHOTOGRAPH 9: Storage area behind welding area. Waste metals and empty drums.



PHOTOGRAPH 10: Storage area behind welding area. Empty fuel tank.



PHOTOGRAPH 11: Drive leading to entrance behind the welding area. Entrance for truck deliveries/pick-ups.



PHOTOGRAPH 12: Side view of Moritz, Inc. facility.



PHOTOGRAPH 13: Side view of Moritz, Inc. facility with drive which leads to former disposal area and welding area.



PHOTOGRAPH 14: Moritz, Inc. facility. Loading dock/main entrance depicted.



PHOTOGRAPH 15: Moritz, Inc. facility. Loading dock/main entrance depicted.



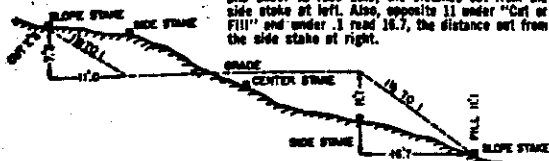
PHOTOGRAPH 16: Inside Moritz, Inc. facility. Camera failed to flash properly.

**APPENDIX B**  
**FIELD LOG BOOK PAGES**

# DISTANCES FROM SIDE STAKES FOR CROSS-SECTIONING

Roadway of any Width. Side Slopes 1 1/2 to 1.

In the figure below, opposite 7 under "Cut or Fill" and under .3 read 11.0, the distance out from the side stake at left. Also, opposite 11 under "Cut or Fill" and under .1 read 16.7, the distance out from the side stake at right.



Distance out from Side or Shoulder Stake	0	.1	.2	.3	.4	.5	.6	.7	.8	.9	Distance out from Side or Shoulder Stake
0	0.0	0.2	0.3	0.5	0.6	0.8	0.9	1.1	1.2	1.4	0
1	1.5	1.7	1.8	2.0	2.1	2.3	2.4	2.6	2.7	2.9	1
2	3.0	3.2	3.3	3.5	3.6	3.8	3.9	4.1	4.2	4.4	2
3	4.5	4.7	4.8	5.0	5.1	5.3	5.4	5.6	5.7	5.9	3
4	6.0	6.2	6.3	6.5	6.6	6.8	6.9	7.1	7.2	7.4	4
5	7.5	7.7	7.8	8.0	8.1	8.3	8.4	8.6	8.7	8.9	5
6	9.0	9.2	9.3	9.5	9.6	9.8	9.9	10.1	10.2	10.4	6
7	10.5	10.7	10.8	11.0	11.1	11.3	11.4	11.6	11.7	11.9	7
8	12.0	12.2	12.3	12.5	12.6	12.8	12.9	13.1	13.2	13.4	8
9	13.5	13.7	13.8	14.0	14.1	14.3	14.4	14.6	14.7	14.9	9
10	15.0	15.2	15.3	15.5	15.6	15.8	15.9	16.1	16.2	16.4	10
11	16.5	16.7	16.8	17.0	17.1	17.3	17.4	17.6	17.7	17.9	11
12	18.0	18.2	18.3	18.5	18.6	18.8	18.9	19.1	19.2	19.4	12
13	19.5	19.7	19.8	20.0	20.1	20.3	20.4	20.6	20.7	20.9	13
14	21.0	21.2	21.3	21.5	21.6	21.8	21.9	22.1	22.2	22.4	14
15	22.5	22.7	22.8	23.0	23.1	23.3	23.4	23.6	23.7	23.9	15
16	24.0	24.2	24.3	24.5	24.6	24.8	24.9	25.1	25.2	25.4	16
17	25.5	25.7	25.8	26.0	26.1	26.3	26.4	26.6	26.7	26.9	17
18	27.0	27.2	27.3	27.5	27.6	27.8	27.9	28.1	28.2	28.4	18
19	28.5	28.7	28.8	29.0	29.1	29.3	29.4	29.6	29.7	29.9	19
20	30.0	30.2	30.3	30.5	30.6	30.8	30.9	31.1	31.2	31.4	20
21	31.5	31.7	31.8	32.0	32.1	32.3	32.4	32.6	32.7	32.9	21
22	33.0	33.2	33.3	33.5	33.6	33.8	33.9	34.1	34.2	34.4	22
23	34.5	34.7	34.8	35.0	35.1	35.3	35.4	35.6	35.7	35.9	23
24	36.0	36.2	36.3	36.5	36.6	36.8	36.9	37.1	37.2	37.4	24
25	37.5	37.7	37.8	38.0	38.1	38.3	38.4	38.6	38.7	38.9	25
26	39.0	39.2	39.3	39.5	39.6	39.8	39.9	40.1	40.2	40.4	26
27	40.5	40.7	40.8	41.0	41.1	41.3	41.4	41.6	41.7	41.9	27
28	42.0	42.2	42.3	42.5	42.6	42.8	42.9	43.1	43.2	43.4	28
29	43.5	43.7	43.8	44.0	44.1	44.3	44.4	44.6	44.7	44.9	29
30	45.0	45.2	45.3	45.5	45.6	45.8	45.9	46.1	46.2	46.4	30
31	46.5	46.7	46.8	47.0	47.1	47.3	47.4	47.6	47.7	47.9	31
32	48.0	48.2	48.3	48.5	48.6	48.8	48.9	49.1	49.2	49.4	32
33	49.5	49.7	49.8	50.0	50.1	50.3	50.4	50.6	50.7	50.9	33
34	51.0	51.2	51.3	51.5	51.6	51.8	51.9	52.1	52.2	52.4	34
35	52.5	52.7	52.8	53.0	53.1	53.3	53.4	53.6	53.7	53.9	35
36	54.0	54.2	54.3	54.5	54.6	54.8	54.9	55.1	55.2	55.4	36
37	55.5	55.7	55.8	56.0	56.1	56.3	56.4	56.6	56.7	56.9	37
38	57.0	57.2	57.3	57.5	57.6	57.8	57.9	58.1	58.2	58.4	38
39	58.5	58.7	58.8	59.0	59.1	59.3	59.4	59.6	59.7	59.9	39
40	60.0	60.2	60.3	60.5	60.6	60.8	60.9	61.1	61.2	61.4	40

Log Book #65

Return to:

Metcalf & Eddy, Inc

2800 Corporate Exchange Drive

Suite 250

Columbus, OH 43231

614-890-5501

# 150043 0012 626

Moritz RFA

*"Rite in the Rain"*

The paper in this book has been treated by an exclusive chemical waterproofing process. Wet or dry, even the hardest pencil will produce a clean, sharp mark.

KEUFFEL & ESSER CO.

9/21/90

(1)

8:35 AM

Cathy Pickrel

Lisa Aclinger Rainy Day

Visual

Site Inspection for

RFA for Moritz

Arrived early

Observed man with

fork lift bring 55 gallon

drum of milky liquid

onto loading dock &

dumping it off dock

onto ground. He did

this twice in a 20 minute

period. Dock located

on left from front

entrance of entrance.

② Leroy Boyd  
Frank Monte  
Jim Boyd

### REVISING Site Closure

Thomas Michaels

Environmental Lawyer  
Monitoring  
EPA used

FINU Meter - ID ing  
exit

No further sampling  
g H<sub>2</sub>O

Asked about water based <sup>dumping</sup> (3)

Rainwater dumping

Surface water drainage  
into sewers.

No floor drains - so  
rainwater just sits on  
floor.

For paint/process areas  
Absorbent used to soak  
solvents - drum it  
& ship it off.

Northeast Chemical

- Classified as flammable  
- must be incinerated

④

Floor sweeping

Paint dusts →

Shipped off too

Paint Pigments -

Paint chips samples

No USTs

10 YEARS

Moritz - always

Trailer Master - <sup>was the</sup> original  
company

owned by Moritz

Moritz furnished contractors  
with all paints etc.

(5)

Monitoring - city of Mansfield  
did some sampling

- Smelled like petroleum  
hydrocarbons

- Volatile compounds  
did sampling in a catch basin  
directly in back of loading dock  
may have taken upstream  
sampling.

Air city water

A Representative of  
Moritz's legal counsel  
Joe Talarano joined us,

Saw drawings get

24-hourly inside  
the facility, primarily  
in areas around the front  
entrance.

⑥ Could be drainage / could be  
A hole in ground / floor  
of area just in front of  
Paint Room.

Paint Storage Area

Deep Stairs forced

Paint Room Small

- smells like solvents

(turpentine type)

Drums of waste xylene &

parts in  
a solvent.

Drums - floor outside

Sweepings

Paint  
Room

3 Pictures

Bucket with Rags - In

Xylene

use/  
Not  
waste

Strong smell of ⑦  
Galvats thru out

Scrap steel ->  
Dents comparison

Back room - pickup  
2 - holes in

Drainage Back  
to the drain  
Storage Room

Outside of manufacturing  
welding area old drums,  
propane tank / propane tank  
on ground  
on truck

(4)

They have plastic sheets  
tied up around 10 ft  
under roof to catch  
water which funnels  
than looks in plastic  
to drums below.

- Some of the water goes  
directly to the floor.

- Then worker squeegees  
up the water into the  
drums.

- Drum water is then  
poured off the back  
cck.

MILEAGE

(9)

START 12735

FINISH 12901

166 TOTAL

Cook Environmental -

Mr. Michaels indicated

Mr. Boyd

that EPA was letting  
them/suggesting that further  
sampling be deferred until  
after the closure plan  
is finalized.

He was upset by the  
short notice given him  
for the inspection. We  
explained that we had called

(10)

Earlier but Mr. Mocitz  
deferred the matter to  
when Mr. Boyd returned  
from his trip out of town.  
We stressed that we weren't  
attempting to surprise him,  
but that we were also  
under a deadline & this  
was the date Mr. Boyd  
agreed to on Friday  
August 14, 1990. They  
had a copy of the meeting  
confirmation letter which  
was sent out Friday  
August 17, 1990.